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Oct 18, 2021

s/ Daryl Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*1848 Kearney Avenue, #2, Racine, Wisconsin to include the Jeep with  
Wisconsin license plate AMB-8482 and its occupants at this address,  
as further described in Attachment A.

Case No. 21 MJ 199

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under  
penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the  
property to be searched and give its location)*:

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed *(identify the  
person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. § 841(a)(1) and 846	Distribution and possession, and conspiracy to distribute and possess with the intent to distribute controlled substances.
31 U.S.C. § 5324(a)(3)	Structuring

The application is based on these facts:

See Attached Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days)* is requested under  
18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



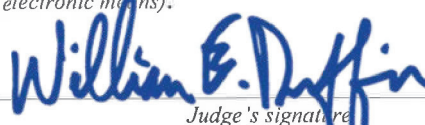
Applicant's signature

FBI TFO Michael Seeger

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone \_\_\_\_\_ *(specify reliable electronic means)*.

Date: October 18, 2021

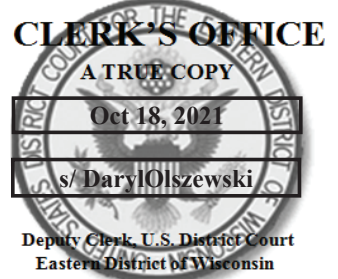


Judge's signature

City and state: Milwaukee, Wisconsin

Hon. William E. Duffin, U.S. Magistrate Judge

Printed name and title



**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR SEARCH WARRANTS**

I, Michael Seeger, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. Affiant has been a law enforcement officer since May 2008. Affiant is a Detective with the Racine Police Department (RAPD) and currently deputized through the Federal Bureau of Investigation (FBI) which expires October 1, 2022. As such, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

2. Affiant is currently assigned to Special Investigation Unit (SIU) – Drug Enforcement and working with the Milwaukee Area Safe Streets Federal Bureau of Investigation (FBI) Gang Task Force (MASSTF). Prior to becoming a Police Detective, Affiant received a bachelor's degree from University of Wisconsin- Platteville in the field of Criminal Justice.

3. As a drug unit detective with RAPD and MASSTF, Affiant has participated in the investigation of narcotics-related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, stolen property, thousands of dollars in United States currency and other evidence of criminal activity. As a narcotics investigator, Affiant has interviewed many individuals involved in drug trafficking and have obtained information from them regarding acquisition, sale, importation, manufacture, and distribution of controlled substances. Through training and experience, Affiant is familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled substances. Affiant has participated in all aspects of drug investigations, including physical surveillance, execution of search warrants, controlled buy operations, court-ordered wiretaps, analysis of phone and financial

records, and arrests of numerous drug traffickers. Affiant has also spoken on numerous occasions with other experienced narcotics investigators, both foreign and domestic, concerning the methods and practices of drug traffickers and money launderers. Furthermore, Affiant has attended training courses, which specialized in the investigation of narcotics trafficking and money laundering. Through these investigations, training and experience, and conversations with other law enforcement personnel, Affiant has become familiar with the methods used by drug traffickers to manufacture, smuggle, safeguard, and distribute narcotics, and to collect and launder trafficking-derived proceeds. Affiant is further aware of the methods employed by major narcotics organizations to thwart any investigation of their illegal activities.

4. Based on training, experience and participation in drug trafficking investigations and associated financial investigation involving controlled substances, Affiant knows and has observed the following:

- a. I have learned about the manner in which individuals and organizations distribute controlled substances in Wisconsin as well as in other areas of the United States.
- b. I am familiar with the coded language utilized over the telephone to discuss drug trafficking and know that the language is often limited, guarded and coded. I also know the various code names used to describe controlled substances.
- c. I know that it is common for persons involved in the sales of controlled substances to be armed with guns and/or to keep firearms in their residence/apartment for their protection and the protection of their controlled substances.
- d. It is a common practice for individuals engaged in high level drug trafficking activities to use multiple locations to conduct their drug trafficking activities. For example, a “stash house” is a location used to store controlled substances, firearms, and U.S. Currency.
- e. I know large-scale drug traffickers often purchase and/or title their assets in fictitious names, aliases or the names of relatives, associates or business entities to avoid detection of these assets by government agencies. I know that even though these assets are in the names other than the drug traffickers, the drug traffickers actually own and continue to use these assets and exercise dominion and control over them.

- f. I know large-scale drug traffickers must maintain on-hand, large amounts of U.S. currency in order to maintain and finance their ongoing drug business.
- g. I know it is common for persons involved in large-scale drug trafficking and related financial crimes to maintain evidence pertaining to their obtaining, secreting, transfer, concealment and/or expenditure of drug proceeds, such as drug ledgers, currency, financial instruments, precious metals and gemstones, jewelry, books, records of real estate transactions, bank statements and records, passbooks, money drafts, letters of credit, money orders, passbooks, letters of credit, bank drafts, cashier's checks, bank checks, safe deposit box keys and money wrappers. Because narcotics trafficking generates large sums of cash, it requires the keeping of detailed records as to the distribution of narcotics as well as the laundering of the proceeds. Such records also typically provide evidence as to the identity of additional criminal associates who are facilitating the laundering of the narcotics proceeds on behalf of the organization. These records, unlike controlled substances, are often maintained for long periods, even several years. These items are maintained by the traffickers within residences, stash houses, vehicles, or other locations over which they maintain dominion and control.
- h. I know it is common for drug traffickers to maintain books, records, receipts, notes ledgers, airline tickets, receipts relating to the purchase of financial instruments and/or the transfer of funds and other papers relating to the transportation, ordering, sale and distribution of controlled substances. That the aforementioned book, records, receipts, notes, ledger, etc., are maintained where the traffickers have immediate access to them.
- i. It is common practice for individuals who are involved in business activities of any nature to maintain books and records of such business activities for lengthy periods of time. It is also common practice for individuals who maintain these records to keep them in places that are secure but easily accessible such as in their businesses, offices, or personal residence.
- j. It is also common that individuals who are attempting to conceal their true income from the IRS will maintain records that will establish their true ownership of assets or other expenditures in a secret manner. These records have included bank records, automobile titles, property deeds, cashier's check receipts, money order receipts, wire transfer receipts, documents pertaining to storage facilities or safe deposit boxes, documents or agreements detailing the true ownership of assets, photographs of the true owners with the concealed assets, or other items such as sales receipts, purchase orders, or shipping invoices.
- k. Likewise, it is common for businesses who engage in transactions with individuals involved in criminal activity to conceal the nature of the transactions through false records such as invoices, by maintaining false financial records, or placing the transaction in a nominee name. These businesses may need to keep these false records for inventory or bookkeeping reasons. However, these false records may be placed in a separate location such as a personal residence, safe, or safe deposit box for concealment.

- l. I know large-scale drug traffickers often use electronic equipment such as telephones (land-lines and cell phones), pagers, computers, telex machines, facsimile machines, currency counting machines and telephone answering machines to generate, transfer, count, record and/or store the information described in the items above, as well as conduct drug trafficking activities.
- m. I know when drug traffickers amass large proceeds from the sale of drugs, the drug traffickers attempt to legitimize these profits through money laundering and structuring activities. To accomplish these goals, drug traffickers utilize the following methods, including, but not limited to: domestic and international banks and their attendant services, securities brokers, professionals such as attorneys and accountants, casinos, real estate, shell corporations and business fronts and otherwise legitimate businesses which generate large quantities of currency.
- n. I know that the Currency Transaction Report (CTR) (Fincen Form 104), which is required to be completed and filed with the IRS by all financial institutions on every currency transaction that exceeds \$10,000, causes tremendous problems with drug traffickers when they attempt to negotiate their illegal profits at a financial institution; I further know that the courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, in particular, trafficking in controlled substances.
- o. I know drug traffickers commonly maintain addresses or telephones numbers in books or papers which reflect names, addresses and/or telephone numbers of their associates in the trafficking organization(s).
- p. I am familiar with computers, cellular telephones, pagers and their uses by drug traffickers to communicate with suppliers, customers, and fellow traffickers and by those engaged in money laundering and structuring activities to communicate with their associates and financial institutions; That drug traffickers use these devices to record their transactions and aspects of their lifestyle related to drug dealing, whether in the form of voicemail, email, text messages, video and audio clips, floppy disks, hard disk drives, flash drives, CD's, DVD's, optical disks, Zip disks, flash memory cards, Smart media and any data contained within such computers or cellular telephones, electronic storage media and other settings particular to such devices; I know that such devices automatically record aspects of such communications, such as lists of calls and communications, and any particularized identification assigned to those source numbers or email addresses by the owner of the devices.
- q. Specifically, I know the following information can be retrieved to show evidence of use of the computer to further the drug trade and/or related financial crimes; Computer systems and cellular telephones, including but not limited to system components, input devices, output devices, data storage devices, data transmission devices, and network devices and any data contained within such systems; and computer media and any data contained within such media and other material relating to computer systems and the internet including but not limited to, documentation, operating system software, application or access program disks, manuals, books, brochures, or notes; and computer access codes, user names, log

files, configuration files, and passwords, screen names, email addresses, IP addresses and cellular / wireless telephones, SIM cards, any removable storage devices for telephones, and any data contained therein, including but not limited to stored telephone numbers, recently called numbers list, text messages, digital audio and/or video recordings, pictures, settings, and any other user defined settings and/or data.

5. Affiant is participating in an investigation of cocaine trafficking and possession of firearms by prohibited persons involving GERARDO LARA (aka “Migo,” aka “Dineroo,”), MARQUAN L. WASHINGTON (aka “Munch,”), MARIO M. JOHNSON (aka “RO,” aka “Roe Gotti,”), TERRY BRUMBY, JR., (aka “T-Nice” aka “Butter,”), MICHAEL D. HARDIN (aka “Mojo,”), CARL C. GRAYSON (aka “Pops,”), PLAZE E. ANDERSON, BRIAN L. PHILLIPS, (aka “B,” aka “Brittle,”), MICHAEL A. WRIGHT JR., JERI L. BALDERAS, JASMINE J. GONZALES, DEBRA J. URNESS, SARAH A. BECKIUS, and ASHLEY M. WESTMORELAND, among others. Affiant is familiar with the facts and circumstances regarding this investigation as a result of my personal participation in this investigation, and my review of: (a) consensually recorded telephone conversations and face-to-face meetings; (b) controlled buys; documentary evidence; physical surveillance; telephone records; electronic surveillance; and physical seizures (b) reports prepared by, and information obtained from, other federal, state, and local law enforcement agents and officers; and (c) information obtained from numerous witnesses, including confidential sources.

6. The facts in this affidavit come from Affiant’s personal observations, training and experience, review of documents, and information obtained from other federal, state, and local law enforcement officers and witnesses. This affidavit is intended to show merely that there is probable cause for the requested warrant and does not set forth all of Affiant’s knowledge about this matter.

## **II. LOCATIONS FOR WHICH SEARCH WARRANTS ARE SOUGHT**

7. On October 5, 2021, a grand jury in this district returned a sealed indictment



charging GERARDO LARA, MARQUAN L. WASHINGTON, MARIO M. JOHNSON, TERRY BRUMBY, JR., MICHAEL D. HARDIN, CARL C. GRAYSON, PLAZE E. ANDERSON, BRIAN L. PHILLIPS, MICHAEL A. WRIGHT JR., DEBRA J. URNESS, JASMINE J. GONZALES, SARAH A. BECKIUS, and ASHLEY M. WESTMORELAND (hereinafter “TARGET SUBJECTS”) with various drug trafficking offenses, including conspiracy to distribute cocaine and cocaine base in the form of “crack cocaine.” *See United States v. Lara, et al.*, Case No. 21-Cr-204 (E.D. Wis.).

8. For the reasons discussed herein, there is probable cause to believe that located at and in the following properties, more fully described in Attachment A and collectively referred to as “TARGET LOCATIONS,” are items that constitute evidence of the crimes committed by the TARGET SUBJECTS, including violations of Title 21, United States Code, Sections 841 and 846 (conspiracy to distribute cocaine and cocaine base in the form of “crack cocaine”) and 31, United States Code Section 5324(a)(3)(structuring to evade reporting requirements), as described in Attachment B:

a. **8761 W 7 Mile Road, Franksville, Wisconsin** to include the green GMC pickup truck with Wisconsin license plate 12031MU, and its occupants, the garage, and outbuildings, including pole barn and horse barn, at this address. This address is utilized by GERARDO LARA and JESUS LARA. Described as a single story, single family ranch house with tan siding, white trim, and black shingled roof with an attached garage with a white garage door. The property has a large red pole barn to the East of the house with other smaller barns and sheds to the South of the house. The numbers “8761” are displayed on a blue and white address sign at the end of the driveway, next to W. 7 Mile road.

b. **2100 Northwestern Avenue, #405, Racine, Wisconsin** to include the green GMC pickup truck with Wisconsin license plate 12031MU and its occupants at this residence. This address is utilized by GERARDO LARA. Described as a multi-story, multi-unit apartment building. The building is tan brick construction with brown exterior doors. The numbers “2100” are horizontally affixed to a brown awning above an exterior door on the Southwest face and “2100 Northwestern” horizontally affixed to a brown awning above an exterior door on the Northeast face of the structure. Apartment 405 is on

the fourth floor and the numbers “405” is affixed to the wall on the right hand side of the white apartment door.

c.     **2213 Lawn Street, Lower Unit, Racine, Wisconsin** to include the blue Dodge Dakota with Wisconsin license plate NZ6772 and maroon Chevy Impala with Wisconsin license plate 481-ZUL, and its occupants at this residence. This address is utilized by BRIAN PHILLIPS and JERI BALDERAS. Described as a two family, two-story residence. The residence has white vinyl siding with white trim. The front porch has made of wood and wood lattice fencing. The numbers “2213” are vertically affixed to a wooden front porch pillar.

d.     **2109 Rupert Boulevard, Racine, Wisconsin** to include the blue Dodge Dakota with Wisconsin license plate NZ6772 and maroon Chevy Impala with Wisconsin license plate 481-ZUL, and its occupants at this residence. This address is utilized by BRIAN PHILLIPS and JERI BALDERAS. Described as a single family, two-story residence. The residence has white siding with white trim and gray lower front porch. The numbers “2109” are vertically affixed to the north face of the structure on a white porch pillar.

e.     **2900 Chicory Road, Racine, Wisconsin** to include the Buick Lacrosse with Wisconsin license plate AMT-1450 and its occupants. This address is utilized by MARQUAN WASHINGTON. Described as multiple condo unit style structure with private entrances. The structure is light gray vinyl siding, brown trim, tan doors, brown shingled roof. 2900 is located at the northern end of the structure on the east face. The numbers “2900” are horizontally affixed directly above the tan front door that faces east.

f.     **928 Delamere Avenue, Front Unit, Racine, Wisconsin** to include the Buick Lacrosse with Wisconsin license plate AMT-1450 and its occupants at this address. This address is utilized by MARQUAN WASHINGTON. Described as a single story, two family residence, having tan vinyl siding, with white trim and black window shutters. The numbers “928” are displayed in a horizontal fashion on the east face of the residence. The front unit doors are the eastern most doors on the north and south face of the residence.

g.     **928 Delamere Avenue, Rear Unit, Racine, Wisconsin** to include the Buick Lacrosse with Wisconsin license plate AMT-1450 and its occupants at this address. This address is utilized by MARQUAN WASHINGTON. Described as a single story, two family residence, having tan vinyl siding, with white trim and black window shutters. The numbers “928” are displayed in a horizontal fashion on the east face of the residence. The rear unit doors are the western most doors on the north and south face of the residence.



h. **7422 Kinzie Avenue, Mount Pleasant, Wisconsin** to include the black GMC Yukon bearing Colorado license plate BHQE50 and its occupants at this address. This address is utilized by TERRY BRUMBY. Described as a two story, single family home, of tan vinyl siding upper and gray brick lower, with white trim on the exterior. The number “7422” are horizontally affixed to the south face directly above the attached 2-car garage door.

i. **3205 Indiana Street, #9, Racine, Wisconsin** to include the black GMC Yukon bearing Colorado license plate BHQE50 and its occupants at this address. This address is utilized by TERRY BRUMBY. Described as a two story, multiple unit apartment building of brown brick construction, tan siding, and white trim. The numbers “3205” are horizontally displayed on the west wood porch directly above the west facing front door. The numbers “3205” are also horizontally displayed on the east wood porch directly above the east facing parking lot door. Apartment 9 is on the second floor. The number “9” is affixed to the center of the apartment door.

j. **1915 Jay Eye See Avenue (Upper Unit), Racine, Wisconsin** to include its occupants at this address. This address is utilized by MARIO JOHNSON. Described as the upper unit of a two story, (2) two family residence, of wood frame construction having a blue exterior siding with white trim and a dark shingled, angled roof; that the numbers “1915 1/2” affixed to a white mailbox on the right side (south) of the lower, West facing front door. The upper unit is accessed through the back door located on the East face of the residence.

k. **1829 Franklin Street, Racine, Wisconsin** to include its occupant at this address. This address is utilized by ASHLEY WESTMORELAND and MARIO JOHNSON. Described as a single family, two- story residence. The residence has white wood siding, gray trim, and gray shingled, angled roof. The numbers “1829” are horizontally affixed above the gray front door on the west face of the residence.

l. **1848 Kearney Avenue, #2, Racine, Wisconsin** to include the Jeep with Wisconsin license plate AMB-8482 and its occupants at this address. This address is utilized by CARL GRAYSON. Described as a four-unit apartment building with blue vinyl siding, white trim and a dark shingled, angled roof. Apartment 2 is located on the South, lower (1<sup>st</sup> floor) level. The numbers “184” are displayed in a horizontal fashion, on the East face porch overhang. The address numbers are missing “8.” The front door faces to the east on the east face and the rear door is located on the west face of the structure.

m. **1312 Russet Street, Racine, Wisconsin** to include the black Chevy Impala with Wisconsin license plate AMJ-7939 and its occupants at this address. This

address is utilized by MICHAEL HARDIN. Described as a two-family modern duplex style building, of wood frame construction, with brown brick lower, tan siding upper and brown trim on the exterior. The numbers “1312” are horizontally affixed to the east side of the building on the left side (south) of the brown front door. The front door is on the east face and back door is on the west face of the building.

n. **2200 Washington Avenue, #212, Racine, Wisconsin** to include the black Chevy Impala with Wisconsin license plate AMJ-7939 and its occupants at this address. This address is utilized by MICHAEL HARDIN. Described as two story, multi-unit apartment building. The building is light brown brick construction, gray trim, with a brown shingled roof. The numbers “2200” are horizontally affixed to the South face of the structure on the right side (east) of the gray front door. The numbers “2200” are also affixed above the gray front door on the South face of the structure. Apartment 212 is on the 2<sup>nd</sup> floor of the northern most structure. The numbers “212” is affixed to the center of the apartment door.

o. **1604 Deane Boulevard, Racine, Wisconsin** to include its occupants at this address. This address is utilized by DEBRA URNESS. Described as a single family, two-story residence. The structure is white vinyl siding, gray trim, and gray shingled roof. The numbers “1604” are horizontally affixed to the East face of the structure, directly above the front, East facing, white front door.

p. **700 W Michigan Street, #W405, Milwaukee, Wisconsin** to include its occupants at this address. This address is utilized by MICHAEL WRIGHT. Described as a multi-level, multi-unit apartment building. The building is brown, red, and tan brick siding. The numbers “700” are horizontally affixed to the south face of the structure. Apartment W405 is on the 4th floor. The number “W405” is affixed to the wall, on the right hand side of the brown apartment door.

q. **2327 Meachem Street, Upper Unit, Racine, Wisconsin** to include its occupants and the garage at this address. This address is utilized by MICHAEL WRIGHT. Described as a two story, two family residence. The building is tan vinyl siding with a red brick lower foundation. The numbers “2327” are horizontally affixed to a white porch pillar on the north face of the structure.

r. **10106 66<sup>th</sup> Street, Kenosha, Wisconsin** to include the white Ford Fusion with Wisconsin license plate 944-CJC and its occupants at this residence. This address is utilized by SARAH BECKIUS. Described as a two story, single family residence. The structure is gray vinyl siding, white trim, and gray shingled roof. The numbers “10106” are horizontally affixed on the south face directly above the attached 2-car garage.

### **III. PROBABLE CAUSE**

#### **A. Background and Summary of Investigation**

9. Since approximately November 2020, the MASSTF and Racine Police Department have been investigating members of the Gangster Disciples (GD) and Vice Lords (VL) street gangs who work together to further their drug trafficking organization on the South side of Racine, Wisconsin. As part of the investigation, members of the Federal Bureau of Investigations (FBI), Drug Enforcement Administration (DEA), Racine Police Department (RAPD), Racine County Sheriff's Department (RCSD), and Village of Mount Pleasant Police Department (MPPD) have conducted physical surveillance, conducted controlled buys of controlled substances, and obtained information through Sources of Information (SOI).<sup>1</sup> MASSTF learned that MARQUAN WASHINGTON, MARIO JOHNSON, MICHAEL HARDIN, TERRY BRUMBY, PLAZE ANDERSON, CARL GRAYSON, and ASHLEY WESTMORELAND were working together to distribute crack and powdered cocaine on the Southside of Racine. MASSTF learned and verified that MARQUAN WASHINGTON is working with BRIAN PHILLIPS, known VL, who sells cocaine and heroin with JASMINE GONZALES and DEBRA URNESS on the Northside of Racine. MARQUAN WASHINGTON and BRIAN PHILLIPS obtain multiple kilograms of cocaine from GERARDO LARA, JESUS LARA and SARAH BECKIUS. Since June 2020,

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<sup>1</sup> During the below listed controlled buys of controlled substances the CHS placed a recorded phone call to the target, captured audio and video of the controlled purchase, was followed to and from the controlled purchase location, was searched before and after the controlled purchase with no drugs, money, or weapons located, debriefed after the controlled purchase, and the above evidence and statements reviewed and verified by law enforcement. Additionally, the controlled substances were all weighed and tested positive for the listed substance using Nark II test kits following the printed instructions and the target was identified by the CHS through photographs. For the purposes of this affidavit, CHS refers to those persons actively cooperating by conducted controlled purchases of illegal drugs. SOI refers to those persons providing information to law enforcement. A SOI with the same number as a CHS are the same person and has provided information to law enforcement and actively cooperated by conducted controlled buys of illegal controlled substances at the direction and control of law enforcement.

MARQUAN WASHINGTON, BRIAN PHILLIPS, GERARDO LARA, and SARAH BECKIUS have pooled money together and travelled out of state to obtain upwards of 9 kilograms of cocaine. MICHAEL WRIGHT has also participated in distributing cocaine with GERARDO LARA and JESUS LARA. MICHAEL WRIGHT obtained cocaine from GERARDO LARA and JESUS LARA prior to MICHAEL WRIGHT'S incarceration in February 2017 and since MICHAEL WRIGHT'S release on June 22, 2021. Further, investigators learned and verified BRIAN PHILLIPS and JERI BALDERAS, BRIAN PHILLIPS' girlfriend, invest their drug proceeds in purchasing multiple properties in the Racine area and rehabbing the properties.

10. Affiant knows based on his law enforcement experience and debriefs with various SOIs and CHS', MARQUAN WASHINGTON, MARIO JOHNSON, TERRY BRUMBY, and PLAZE ANDERSON are Gangster Disciples (GD) gang members. Affiant further knows based on his law enforcement experience and debriefs with various SOIs and CHS', MICHAEL HARDIN, MICHAEL WRIGHT, and BRIAN PHILLIPS are Vice Lord (VL) gang members.

11. On December 1, 2020, Affiant became aware of a FBI Tip reference drug trafficking by GERARDO LARA in Racine, Wisconsin. The Tipster stated s/he is aware that large amounts of cocaine is stored and sold out of **8761 W 7 Mile Road, Franksville, Wisconsin**. The male, GERARDO LARA, would obtain pounds of cocaine from Chicago and brings it back to Racine, Wisconsin. GERARDO LARA was also having a female, SARAH BECKIUS, travel with him to pick up the cocaine to bring it back to Racine, Wisconsin. The Tipster stated he/she has personally witnessed drug deals involving GERARDO LARA and SARAH BECKIUS.

**B. Information Obtained From Sources of Information (SOIs)**

12. Law enforcement conducted numerous debriefs, which included members of the drug trafficking organization, SOI #8, #9, and #18, and individuals that also participated in

controlled drug buys including SOI #6, #7, #10, and #17. The debriefs consistently reflected that twin brothers, JESUS LARA and GERARDO LARA, and Gerardo's girlfriend, SARAH BECKIUS, are the major source suppliers of cocaine for BRIAN PHILLIPS and MARQUAN WASHINGTON. The debriefs further demonstrated that GERARDO LARA, BRIAN PHILLIPS and MARQUAN WASHINGTON pool their money together and travel out of state to purchase kilograms of cocaine. Several debriefs indicated BRIAN PHILLIPS and MARQUAN WASHINGTON would each obtain about 4 kilograms of cocaine per month from GERARDO LARA and JESUS LARA. The debriefs also revealed that in March 2021, SARAH BECKIUS and GERARDO LARA were robbed, and suspected MARQUAN WASHINGTON in the robbery, so they no longer worked directly with MARQUAN WASHINGTON in obtaining cocaine. However, BRIAN PHILLIPS would still provide MARQUAN WASHINGTON with cocaine which BRIAN PHILLIPS obtained with GERARDO LARA. Based on records from the Racine Police Department, a burglary in progress was reported at the prior residence of SARAH BECKIUS on March 9, 2021. Additionally, according to prison phone calls from MICHAEL WRIGHT to 262-598-7249, LARA was the victim of a burglary perpetrated by MARQUAN WASHINGTON for \$160,000.

13. The debriefs also detailed how MARQUAN WASHINGTON and his organization would distribute their product and store it at stash houses including **1848 Kearney Ave, #2**, as well as members' girlfriend's residences. GD members would also assist in looking out for possible law enforcement during drug transactions, share rental cars for distributing drugs, and assist in conducting drug transaction when another member was not available.

#### **1. Information Obtained From SOI #1**

14. On March 3, 2021, and August 5, 2021, TFO Langendorf and Affiant conducted a debrief of SOI #1. SOI #1 identified that TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, Akeem First, CARL GRAYSON, Tirawann Barker and PLAZE ANDERSON are working together in a drug trafficking organization to distribute large amounts of crack cocaine and marijuana within the City of Racine. SOI #1 stated that the group runs a drug dealing business out of GRAYSON'S apartment on Kearney Ave. Affiant is aware through the course of this investigation and Police records that GRAYSON resides at **1848 Kearney Ave, #2, Racine, WI.**<sup>2</sup>

15. Beginning in November 2020, Affiant frequently observed MARQUAN WASHINGTON, MARIO JOHNSON, Akeem First, PLAZE ANDERSON, and CARL GRAYSON at **1848 Kearney Ave, Racine, Wisconsin.** Affiant knew MARQUAN WASHINGTON, MARIO JOHNSON, Akeem First, and PLAZE ANDERSON through previous law enforcement investigations involving controlled substances, violence, and being Gangster Disciple (GD) gang members. On various days throughout November 2020 Affiant conducted covert surveillance of **1848 Kearney Ave** and observed numerous short-term contacts with the residence that Affiant believed based on training and experience to be drug transactions. During these suspected drug transactions, Affiant observed at least one, if not more, of the above mentioned individuals at **1848 Kearney Ave.** Affiant also observed the above mentioned individuals utilizing rental vehicles which Affiant knows based on his training and experience to be used by drug dealers to assist them in the sales of controlled substances. Affiant observed the above-mentioned individuals frequently coming and going from **1848 Kearney Ave,** consistent

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<sup>2</sup> SOI #1's information is credible and reliable because SOI #1 has given information concerning individuals involved in illegal activities, which has been independently verified through this investigation. SOI #1 cooperated with law enforcement in exchange for consideration on a felony charge and received monetary compensation. SOI #1 has prior adult felony convictions for Manufacture/Delivery of Cocaine, Bail Jumping, and Possession of THC, and an adult misdemeanor conviction for Possession of THC. SOI #1 has a criminal traffic misdemeanor for Operating a vehicle without a license.



with utilizing **1848 Kearney Ave** as a “stash house” and sharing rental vehicles with each other.

16. SOI #1 has personally observed MARQUAN WASHINGTON and MARIO JOHNSON exchange crack cocaine, money, and cell phones back and forth 2-3 times in early 2021. SOI #1 has personally observed MICHAEL HARDIN pick up money from MARQUAN WASHINGTON and MARIO JOHNSON in early 2021.

17. On March 7, 2021, SOI #1 observed MARQUAN WASHINGTON and Tirawann Barker at Taylor Mart gas station, 1813 Taylor Avenue, Racine, Wisconsin. SOI #1 stated MARQUAN WASHINGTON and Tirawann Barker were in separate rental vehicles and observed MARQUAN WASHINGTON provide Tirawann Barker with controlled substances, believed to be crack cocaine. Once the drug transaction was completed, both MARQUAN WASHINGTON and Tirawann Barker left the gas station parking lot. SOI #1 stated that Tirawann Barker was operating a light blue Chrysler rental van that he/she previously observed TERRY BRUMBY driving.

## **2. Information Obtained From SOI #2**

18. On March 4, 2021, RAPD TFO Daniel Langendorf conducted a debrief of SOI #2. SOI #2 identified a drug trafficking organization operating in the City of Racine consisting of, but not limited to, TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, Tirawann Barker, Akeem First, PLAZE ANDERSON, and Zisirtike McMillian. SOI #2 had knowledge that the above individuals will pool their money together to buy larger quantities of cocaine for better prices. SOI #2 has personally observed several members to be in possession of a large amount of money and share rental vehicles.<sup>3</sup>

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<sup>3</sup> SOI #2's information is credible and reliable because SOI #2 has given information concerning individuals involved in illegal activities, which has been independently verified through this investigation. SOI#2 cooperated with law enforcement in exchange for consideration on felony charges and received no monetary consideration. SOI #2 has

### 3. Information Obtained From SOI #3

19. On March 5, 2021 and August 6, 2021, TFO Langendorf and Affiant conducted a debrief of SOI #3. SOI #3 identified TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, Tirawann Barker, Akeem First, Zisirtike Mcmillian, MICHAEL HARDIN, PLAZE ANDERSON, and Mark Etinne as are working together as a group to sell and distribute illegal drugs within the City of Racine. SOI #3 stated that the above individuals will use rental vehicles to sell crack cocaine. SOI #3 knows some of the individuals share cell phones to assist one another in completing drug transactions. SOI #3 knows Akeem First and PLAZE ANDERSON are “runners” for other members of the group. SOI #3 has personally witnessed MARQUAN WASHINGTON sell crack cocaine and possess a firearm. SOI #3 knows MICHAEL HARDIN to sell crack cocaine, heroin, and marijuana for the group and personally observed MICHAEL HARDIN with a firearm in 2020. SOI #3 believes that TERRY BRUMBY is the leader of the group and will sell about a kilogram of cocaine per month. SOI #3 believes that TERRY BRUMBY supplies drugs to MARIO JOHNSON and MARQUAN WASHINGTON.<sup>4</sup> SOI #3 personally observed TERRY BRUMBY provide Tirawann Barker around a quarter ounce to half ounce of crack cocaine in the Fall 2020 at Taylor Mart gas station, 1813 Taylor Ave., Racine, WI. Based on publicly available records, Affiant is aware that Mark Etinne was previously convicted

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adult felony convictions for 1<sup>st</sup> Degree Reckless Endangering Safety x2, Fleeing and Eluding x2, Manufacture/Deliver Cocaine x3, and Maintain Drug Trafficking Place.

<sup>4</sup> SOI #3's information is credible and reliable because SOI #3 has given information concerning individuals involved in illegal activities which has been independently verified through this investigation. SOI #3 cooperated with law enforcement in exchange for monetary compensation. SOI #3 has adult felony convictions for Attempted Bribery of Witness, Failure to Report to County Jail, 2<sup>nd</sup> Degree Recklessly Endangering Safety, Substantial Battery, and misdemeanor convictions for Bail Jumping, Intentionally Pointing a Firearm at Person x2, Disorderly Conduct, Operating Vehicle after Revocation, and Criminal Trespass to Dwelling.

of a drug trafficking offense in *United States v. Etinne*, Case Nos. 04-CR-133 and 09-CR-35 (E.D. Wis.).

20. At the end of June 2020, SOI #3 advised Affiant that BRIAN PHILLIPS obtained a new home that he's rehabbing around Rupert Boulevard and Chicago Street. SOI #3 advised Affiant a big red dumpster was in front of BRIAN PHILLIPS' new house. Affiant responded to the area located a big red dumpster in front of **2109 Rupert Blvd**. The residence of **2109 Rupert Blvd** appeared to being rehabbed by the items in the dumpster and a permit being stuck in a North facing window.

21. On August 18, 2021, CHS #3 observed TERRY BRUMBY operating a black rental truck with Colorado plates in the area of Fratt Elementary School, 3501 Kinzie Ave., Racine WI. CHS #3 observed TERRY BRUMBY sell crack cocaine at this location while utilizing the black rental truck. On August 9, 2021, Affiant personally observed TERRY BRUMBY operating a similar vehicle at 3300B Indiana St. On at least three occasions between August 11, 2021, and August 18, 2021, Affiant has also personally observed a black GMC Yukon bearing Colorado license plate BHQE50, parked at TERRY BRUMBY'S primary residence of **7422 Kinzie Ave**. Based on their training and experience, and the investigation to date, Affiant believes that this is the same vehicle CHS#3 observed.

#### **4. Information Obtained From SOI #4**

22. On March 12, 2021, RAPD TFO David Rybarik conducted a debrief of SOI #4 who was in custody on drug and gun charges. SOI #4 stated that BRIAN PHILLIPS and MARQUAN WASHINGTON were two large level drug dealers in the City of Racine. SOI #4 stated that both BRIAN PHILLIPS and MARQUAN WASHINGTON purchase cocaine from the same Hispanic Male identified only by nickname as "Migo". SOI #4 stated that BRIAN PHILLIPS recently paid

“Migo” \$61,000 as payment for controlled substances. SOI #4 knows that BRIAN PHILLIPS and MARQUAN WASHINGTON use the same source of supply for cocaine and that SOI #4 is a longtime friend of BRIAN PHILLIPS. SOI #4 knows that MARQUAN WASHINGTON purchases approximately 1-1.5 kilograms of cocaine from “Migo” every month over the past year. SOI #4 also knew that “Migo” was the victim of a burglary where \$160,000 was stolen. SOI #4 knew that MARQUAN WASHINGTON had orchestrated the burglary by luring “Migo” away from the residence to use a money counter. SOI #4 knows that MARQUAN WASHINGTON will obtain cocaine from BRIAN PHILLIPS when “Migo” is unavailable.<sup>5</sup>

23. SOI #4 identified that MARQUAN WASHINGTON, TERRY BRUMBY, MARIO JOHNSON, and Akeem First all work together to sell crack cocaine and marijuana and all pool their money and resources to purchase and distribute larger loads of controlled substances for increased drug proceeds. MARQUAN WASHINGTON, TERRY BRUMBY, MARIO JOHNSON, and Akeem First use **1848 Kearney Ave, Racine, WI** as their “spot” to store, package, and distribute controlled substances.

## **5. Information Obtained From SOI #5**

24. On March 17, 2021 and July 27, 2021, Affiant and TFO Langendorf conducted a debrief of SOI #5. SOI #5 identified that TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, Mark Etinne, Akeem First, and Zisirtike McMillian to be working as a group to sell large amounts of heroin, cocaine, and marijuana within the City of Racine. SOI #5 stated that

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<sup>5</sup> SOI #4’s information is credible and reliable because SOI #4 has given information against SOI #4’s penal interest and provided information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #4 is cooperating with law enforcement in exchange for consideration on felony charges. SOI #4 has adult felony convictions for Possession with Intent to Deliver Cocaine, Battery by Prisoners, Possession with Intent to Deliver Cocaine, Fleeing and Eluding an Officer, 2<sup>nd</sup> Degree Recklessly Endangering Safety, and misdemeanor convictions for Obstructing/Resisting an Officer x4, Possession of THC x2, Bail Jumping, Disorderly Conduct, and Criminal Damage to Property.

the above members pool their money together and purchase the drugs as a group. Members of the DTO utilize stash houses to store their drugs and money. Members of the DTO are also aware of the undercover surveillance vehicles utilized by the Special Investigations Unit (SIU).<sup>6</sup>

25. SOI #5 stated that MARQUAN WASHINGTON, MARIO JOHNSON, and Akeem First to commit robberies within Racine. SOI #5 stated MARQUAN WASHINGTON is often in possession of a firearm.

#### **6. Information Obtained From SOI #6**

26. On March 3, 2021, TFO Rybarik and Affiant conducted a debrief of SOI #6. SOI #6 identified TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, MICHAEL HARDIN, and CARL GRAYSON are working together to sell large amounts of controlled substances in the City of Racine. SOI #6 also knows that MARQUAN WASHINGTON was involved in the theft of \$160,000 from a “Mexican” that was the source of supply of cocaine for MARQUAN WASHINGTON. SOI #6 knew that this Hispanic male was previously the source of supply (cocaine) for MICHAEL WRIGHT prior to MICHAEL WRIGHT being incarcerated. SOI #6 stated that MARQUAN WASHINGTON was recently “robbed” of \$30,000 and this caused everybody in the group to use more legitimate methods including bank accounts to store their money.<sup>7</sup>

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<sup>6</sup> SOI #5’s information is credible and reliable because SOI #5 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #5 has provided law enforcement information in the past reliable including information on drug and weapon offenses and the location of wanted persons. SOI #5 is cooperating with law enforcement in exchange for monetary payment and has received monetary compensation. SOI #5 has adult felony convictions for Prisoner Expel Bodily Substance, Bail Jumping, and misdemeanor convictions for Battery and Disorderly Conduct.

<sup>7</sup> SOI #6’s information is credible and reliable because SOI #6 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #6 is cooperating in exchange for consideration on a potential felony charge and has received \$300 in monetary payments. SOI #6 has no adult felony convictions and has misdemeanor convictions for Disorderly Conduct, Retail Theft, Attempted Retail Theft, Bail Jumping, Resisting/Obstructing an Officer, Bail Jumping, Operating Vehicle while Revoked, Resisting/Obstructing an Officer, and various criminal traffic charges.

27. On March 30, 2021, SOI #6 personally observed about 30 individual bags of crack cocaine inside MARIO JOHNSON's residence of **1915 Jay Eye See Ave., Upper Unit**. SOI #6 stated the 30 bags of crack cocaine were packaged in "50's" or 0.5 grams, which would sell for \$50 each on the street. MARIO JOHNSON and MARQUAN WASHINGTON were present at **1915 Jay Eye See Ave., Upper Unit** at the time SOI #6 made the observation.

28. SOI #6 stated MARIO JOHNSON was the target of a recent shooting and in result of being targeted in that shooting, MARIO JOHNSON always in possession of a firearm.

29. SOI #6 personally observed crack cocaine, heroin, and guns inside CARL GRAYSON's residence of **1848 Kearney Avenue** between December 2020 and March 2021. SOI #6 also stated that CARL GRAYSON has a "large killer dog."

30. SOI #6 knows MICHAEL HARDIN to be actively involved in the drug trafficking operation and he is selling crack cocaine, marijuana, and possessing guns.

31. On April 19, 2021, Affiant, TFO Rybarik, and RCSD TFO Jason Baclawski met with CHS #6. CHS #6 received a phone call from MARIO JOHNSON which was recorded. During the conversation MARIO JOHNSON is inquiring about getting a handgun back from CHS #6. During the phone call MARIO JOHNSON says, "You know, listen cuz. You know dat shit mine." Once the recorded phone call was over CHS #6 confirmed with Affiant that MARIO JOHNSON was trying to get his handgun back. CHS #6 explained that after Akeem First was shot on March 14, 2021, MARIO JOHNSON gave Akeem First his handgun. Akeem First then got arrested on March 26, 2021, with a different gun but was never able to give MARIO JOHNSON his gun back before Akeem First's arrest. CHS #6 explained that the handgun Akeem First got caught with was not MARIO JOHNSON's handgun; it was a different handgun.

## **7. Information Obtained From SOI #7**



32. On March 31, 2021, and June 30, 2021, SOI #7 debriefed with law enforcement. SOI #7 identified "T-Nice (TERRY BRUMBY), "Munch" (MARQUAN WASHINGTON), "Roe Gotti" (MARIO JOHNSON), "Mojo" (MICHAEL HARDIN), "Keem" (Akeem First), PLAZE ANDERSON, and "E-Way" (Tirawann Barker) to be working together in a drug trafficking organization to sell large amounts of controlled substances within the City of Racine. SOI #7 identified **1848 Kearney Avenue** as the stash house which is run by a guy nicknamed "Pops," identified as CARL GRAYSON. SOI #7 knows that MARQUAN WASHINGTON has the cocaine connection and that the rest of the group will pool their money together and then TERRY BRUMBY will go and pick up the controlled substances. SOI #7 knows TERRY BRUMBY, MARQUAN WASHINGTON, MARIO JOHNSON, MICHAEL HARDIN, Akeem First, PLAZE ANDERSON, Tirawann Barker, and Zisirtike McMillian to be working as a criminal organization to sell controlled substances within the City of Racine to make large amounts of money. SOI #7 knows the group of individuals are working together, pooling their money together to purchase large quantities of cocaine and marijuana. SOI #7 knows that the group is actively selling illegal drugs within Racine. SOI #7 knows the group to often utilize rental vehicles to assist them in the sales of controlled substances. SOI #7 has personally observed controlled substances and firearms at **1848 Kearney Avenue** and **1915 Jay Eye See Ave., Upper Unit**, which are both in the City of Racine. Lastly, SOI #7 knows this group of individuals have been closely working together to sell controlled substances since at least 2015.<sup>8</sup>

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<sup>8</sup> SOI #7's information is credible and reliable because SOI #7 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #7 is cooperating in exchange for consideration on a felony charge and has received monetary compensation. SOI #7 has completed controlled purchases of cocaine from members of the group further corroborated by video evidence. SOI #7 has adult felony convictions for Theft, Possession with Intent to Deliver Cocaine, Possession of Cocaine, Felon in Possession of a Firearm, and misdemeanor convictions for Possess Dangerous Weapon by person under 18, Carrying a Concealed Weapon, Battery, Resisting/Obstructing an Officer, Battery, Resisting/Obstructing an Officer, Bail Jumping, and Disorderly Conduct.

33. SOI #7 stated in 2021 s/he has observed TERRY BRUMBY at **3205 Indiana Street** over 100 times, MARIO JOHNSON at **3205 Indiana Street** 5-10 times, and Tirawann Barker at **3205 Indiana Street** about 50 times.

34. On May 25, 2021, SOI #7 observed a mail package at **3205 Indiana Street** listing to TERRY BRUMBY at **3205 Indiana Street, Apartment 9, Racine, Wisconsin**.

35. SOI #7 stated in March 2021, SOI #7 observed Akeem First obtain a .45 caliber handgun from **1848 Kearney Avenue**.

36. SOI #7 stated in the Summer 2020, SOI #7 observed MARIO JOHNSON provide Akeem First with a 1911 .45 caliber handgun from **1915 Jay Eye See Ave., Upper Unit**.

37. SOI #7 knows MARQUAN WASHINGTON to carry firearms on a regular basis. SOI #7 has personally observed MARQUAN WASHINGTON in possession of a handgun 2-3 times from January 2020 – March 2021. SOI #7 knows MICHAEL HARDIN to carry firearms on a regular basis. SOI #7 has personally observed MICHAEL HARDIN in possession of a 9mm and/or .40 caliber handgun 2-3 times from January 2020 – March 2021.

38. On September 27, 2021, CHS #7 advised Affiant that MICHAEL WRIGHT is currently dating Taleatha Burnette. CHS #7 provided Taleatha Burnette's Facebook profile as "Tee Tee Burnette." Affiant checked the Racine County law enforcement database and located Taleatha D Burnette, of **700 W Michigan St, W405, Milwaukee, WI**. TFO Matson began conducting covert surveillance of **700 W Michigan Street** and observed MICHAEL WRIGHT arrive in his gray Nissan rental vehicle, CA 8RAM346. MICHAEL WRIGHT was observed entering **700 W Michigan Street** and later leaving the same address with Taleatha Burnette, who was dressed in a medical uniform (scrubs).

## **8. Information Obtained From SOI #8**

39. On April 12, 2021, and May 26, 2021, TFO Rybarik, TFO Langendorf, and Affiant conducted a debrief of SOI #8. SOI #8 acknowledged being an active participant with a group of individuals, including MARQUAN WASHINGTON, TERRY BRUMBY, MARIO JOHNSON, MICHAEL HARDIN, Tirawann Barker, Zisirtike Mcmillian, CARL GRAYSON, and PLAZE ANDERSON, who distribute controlled substances in the City of Racine. SOI #8 identified MARQUAN WASHINGTON as the cocaine leader of the group and that MARQUAN WASHINGTON is obtaining approximately 4 kilograms of cocaine a month from a Hispanic Male SOI #8 knows only as “Migo.” SOI #8 outlined how MARQUAN WASHINGTON will then distribute one kilogram of cocaine to TERRY BRUMBY and MARIO JOHNSON and keep two kilograms for himself. SOI #8 knows the group utilizes **1848 Kearney Avenue** for hanging out and selling the drugs. SOI #8 knows that MARIO JOHNSON is actively selling large amounts of cocaine and marijuana in the City of Racine and has personally observed MARIO JOHNSON in possession of over \$100,000 in drug proceeds. SOI #8 knows that MICHAEL HARDIN gets 4.5 ounces of cocaine per month from MARQUAN WASHINGTON, TERRY BRUMBY, or MARIO JOHNSON.<sup>9</sup>

40. SOI #8 has personally observed MARQUAN WASHINGTON many times in possession of a 9mm semi-automatic handgun and knows MARQUAN WASHINGTON can and will shoot if threatened by another individual.

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<sup>9</sup> SOI #8's information is credible and reliable because SOI #8 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #8 has also provided information against SOI#8's penal interest. SOI #8 is cooperating in exchange for consideration on felony charges and has received no monetary consideration. SOI #8 has adult felony convictions for Possession with Intent THC, Bail Jumping x2, and three misdemeanor convictions for Resisting/Obstructing an Officer.

41. SOI #8 stated TERRY BRUMBY has a stash house on the Southside of Racine off Durand Ave. Affiant showed SOI #8 a picture of **3205 Indiana Street, Racine, Wisconsin**, and SOI #8 positively identified the building as TERRY BRUMBY's stash apartment.

42. SOI #8 stated that MARIO JOHNSON utilizes female acquaintances houses to stash his drugs and money.

#### **9. Information Obtained From SOI #9**

43. On May 13, 2021, TFO Haleen and TFO Rybarik conducted a debrief of SOI #9. SOI #9 has participated in and has firsthand knowledge of the drug trafficking operation of "T-Nice" (TERRY BRUMBY), "Munch" (MARQUAN WASHINGTON), "Roe Gotti" (MARIO JOHNSON), "Brittle" (BRIAN PHILLIPS), and SARAH BECKIUS. SOI #9 has intimate knowledge that SARAH BECKIUS partnered with MARQUAN WASHINGTON and BRIAN PHILLIPS in distributing and trafficking kilogram quantities of cocaine in Racine, WI. SOI #9 knows that SARAH BECKIUS has been purchasing a kilogram of cocaine from MARQUAN WASHINGTON and BRIAN PHILLIPS every two weeks since January 2020. SOI #9 has direct knowledge that MARQUAN WASHINGTON and BRIAN PHILLIPS are working together to obtain and distribute kilograms of cocaine with SARAH BECKIUS and personally observed SARAH BECKIUS purchase kilograms of cocaine from both MARQUAN WASHINGTON and BRIAN PHILLIPS. SOI #9 has witnessed SARAH BECKIUS purchase kilograms of powder cocaine from BRIAN PHILLIPS at his residence of **2213 Lawn Street**. However, SOI#9 believes that BRIAN PHILLIPS stores his cocaine at rental houses which are being remodeled. SOI #9 knows that MARQUAN WASHINGTON stores his cocaine at CARL GRAYSON's apartment at **1848 Kearney Avenue** in Racine, WI. SOI #9 has witnessed MARQUAN WASHINGTON, BRIAN PHILLIPS, and SARAH BECKIUS pooling their money to purchase kilograms of cocaine

and SOI #9 was present when SARAH BECKIUS, MARQUAN WASHINGTON, and BRIAN PHILLIPS traveled out of state to Oklahoma and Missouri to pick up kilograms of cocaine. SOI #9 also had firsthand knowledge SARAH BECKIUS was burglarized and \$200,000 was taken along with 2 kilograms of cocaine and believes that MARQUAN WASHINGTON was responsible for the Burglary. SOI #9 provided the current phone number for SARAH BECKIUS to be 262-321-8564 which Affiant was able to verify with call detail records.<sup>10</sup>

#### **10. Information Obtained From SOI #10**

44. On May 21, 2021, TFO Langendorf, TFO Rybarik, and Affiant conducted a debrief of SOI #10. SOI #10 met BRIAN PHILLIPS in January 2020 and identified BRIAN PHILLIPS as one of the largest and best quality crack cocaine dealers on the north side of Racine, WI. SOI #10 would purchase various amounts of crack cocaine from BRIAN PHILLIPS almost daily from .2 grams up to 3.5 grams and that BRIAN PHILLIPS would consistently be operating a silver KIA SUV when delivering the crack cocaine. SOI #10 stated that half of the time BRIAN PHILLIPS would send a runner, JASMINE GONZALES, to deliver the controlled substances. SOI #10 provided BRIAN PHILLIPS phone number as 262-221-6999.<sup>11</sup>

45. SOI #10 met CARL GRAYSON in November 2020 and would purchase small amounts of crack cocaine from CARL GRAYSON at **1848 Kearney Ave., #2**. SOI #10 knows

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<sup>10</sup> SOI #9's information is credible and reliable because SOI #9 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #9 is cooperating in exchange for consideration on felony charges and has received no monetary consideration. SOI #9 has no adult felony convictions and has one misdemeanor conviction for Possessing Illegally Obtained Prescription.

<sup>11</sup> CHS #10's information is credible and reliable because CHS #10 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. CHS #10 has conducted multiple controlled purchases of controlled substances captured on video/audio recordings further corroborating CHS #10's statements. CHS #10 is cooperating with law enforcement in exchange for consideration for felony and misdemeanor charges and has received monetary compensation. CHS #10 has a felony conviction for Possession with Intent to Deliver Narcotics and no misdemeanor convictions.

that CARL GRAYSON is supplied crack cocaine from MARIO JOHNSON and MARQUAN WASHINGTON. SOI #10 stated that CARL GRAYSON has told SOI #10 he has a firearm and is not afraid to use it.

46. Affiant is aware that CHS #10 provided TFO Rybarik and TFO Haleen with CARL GRAYSON's stash house. CHS #10 stated in March 2021 s/he took CARL GRAYSON over to an apartment on **Indiana Street** in Racine, Wisconsin, to pick up about two (2) ounces of crack cocaine. CHS #10 then took CARL GRAYSON back to **1848 Kearney Avenue** where CARL GRAYSON would sell the crack cocaine to drug users. Days later, CHS #10 took TFO Rybarik and TFO Haleen to CARL GRAYSON's stash apartment. CHS #10 identified **3205 Indiana St., Racine, Wisconsin**, as CARL GRAYSON's stash apartment.

#### **11. Information Obtained From SOI #11**

47. On May 28, 2021, TFO Haleen and TFO Langendorf conducted a debrief of SOI #11. SOI #11 identified BRIAN PHILLIPS as a large level drug dealer that sells crack cocaine and heroin in the City of Racine, WI. SOI #11 knows that JASMINE GONZALES is working for BRIAN PHILLIPS to deliver controlled substances and had personally obtained controlled substances from both BRIAN PHILLIPS and JASMINE GONZALES who have shown up together and, other times, separately to deliver the controlled substances. SOI #11 also has personally observed April Howe obtaining cocaine from MARIO JOHNSON.<sup>12</sup>

#### **12. Information Obtained From SOI #14**

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<sup>12</sup> SOI #11's information is credible and reliable because the information provided regarding other person involved in the sale of illegal controlled substance has been corroborated by other reliable sources. SOI #11 is cooperating with law enforcement in exchange for consideration on felony charges. SOI #11 has no adult felony convictions and misdemeanor convictions for Operating a Vehicle While Intoxicated, Receiving Stolen Property, Bail Jumping, Theft-Movable Property, Possession of THC, and other traffic related offenses.



48. On June 9, 2021, Affiant conducted a debrief of SOI #14. SOI #14 is not privy to the drug organization and is a citizen eyewitness. SOI #14 specifically stated that a Silver KIA SUV with Wisconsin Registration AHL-6747 has been distributing controlled substances on Orange Street, in the City of Racine, WI. SOI #14 personally witness the KIA SUV come from Lawn Street and meet with a Black Dodge Durango with no plates, a Black Jeep Cherokee, and a brown Ford F150 with personalized veteran plates to conduct drug transactions. Affiant knows that BRIAN PHILLIPS lives at **2213 Lawn Street** with JERI BALDERAS. Based on records from the Wisconsin Department of Transportation, Affiant is aware that the above-mentioned KIA SUV lists to JERI BALDERAS at the above address. <sup>13</sup>

### **13. Information Obtained From SOI #15**

49. On May 10, 2021, Affiant, TFO Rybarik, and TFO Haleen conducted a debrief of SOI #15. SOI #15 stated that SARAH BECKIUS is dating GERARDO LARA and that GERARDO LARA has used SARAH BECKIUS to traffic kilograms of cocaine from the Chicago Area to Racine, WI. SOI #15 was shown a picture of 8 kilograms of cocaine from SARAH BECKIUS who stated that SARAH BECKIUS picked up the cocaine in Chicago. SOI #15 was also shown a horse farm on 7-mile Road in Racine County where GERARDO LARA lives with his twin brother Jesus Lara. SOI #15 states that Jesus Lara is an enforcer and directly involved in the drug trafficking organization. <sup>14</sup>

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<sup>13</sup> SOI #14's information is reliable and credible because SOI #14 is a citizen eyewitness and information provided is based upon SOI #14's personal knowledge and observations. SOI #14 provided information to law enforcement for the betterment of the community and has received no compensation. SOI #14 has no adult felony or misdemeanor convictions.

<sup>14</sup> SOI #15's information is credible and reliable because SOI #15 is providing information based on SOI #15's personal knowledge and observations and said information has been corroborated by other sources during this investigation and supported by surveillance and call detail records. SOI #15 is cooperating with law enforcement for monetary consideration. SOI #15 has no felony convictions and has misdemeanor convictions for Retail Theft x3, Criminal Trespass to Dwelling, and Disorderly Conduct.

#### 14. Information Obtained From SOI #16

50. On June 17, June 18, June 28, and July 8, 2021, Affiant and RAPD Detective Steven Diener conducted a debrief of SOI #16. SOI #16 had direct and firsthand knowledge of the drug trafficking operation involving CARL GRAYSON, MARQUAN WASHINGTON, MARIO JOHNSON, and TERRY BRUMBY. SOI #16 identified CARL GRAYSON as regularly obtaining half ounce to an ounce of crack cocaine from his “nephews” who were identified as MARQUAN WASHINGTON, MARIO JOHNSON, and TERRY BRUMBY. CARL GRAYSON then sells small amounts of crack cocaine to drug users after he (CARL GRAYSON) obtains the crack cocaine from MARQUAN WASHINGTON, MARIO JOHNSON, or TERRY BRUMBY.<sup>15</sup>

51. Since May 2021, SOI #16 has witnessed TERRY BRUMBY delivery half ounce to an ounce of crack cocaine to CARL GRAYSON at **1848 Kearney Ave, #2** on 3-4 occasions. Since May 2021 SOI #16 has witnessed MARQUAN WASHINGTON deliver half ounce to an ounce of crack cocaine to CARL GRAYSON at **1848 Kearney Ave., #2** on at 6 occasions.

52. SOI #16 advised Affiant that CARL GRAYSON has been the target of recent robberies which involved the suspect shooting a shotgun inside CARL GRAYSON’s residence. SOI #16 advised that CARL GRAYSON claims he has a handgun, but after the most recent attempted robbery CARL GRAYSON is trying to obtain an AR-15 rifle for better protection. SOI

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<sup>15</sup> SOI #16’s information is credible and reliable because the information provided regarding other person involved in the sale of illegal controlled substance has been corroborated by other reliable sources. SOI #16 has supplied information to the RAPD, Special Investigations Unit (SIU) that has resulted in at least 11 felony arrest and 3 misdemeanor arrests in the last 7 months. SOI #16 has participated in controlled buy operations as well as providing information to law enforcement. SOI #16 has provided information on at least 10 drug dealers operating in the City of Racine that has been corroborated through investigations and/or other sources. Affiant isn’t aware of any incident SOI #16 has been untruthful with Affiant. SOI #16 is cooperating with law enforcement in exchange for consideration on felony charges. SOI #16 has an adult felony conviction for Possession of Narcotic Drugs. Affiant is also aware that SOI #16 died on 7/19/2021 from a possible drug overdose.

#16 also advised that **1848 Kearney Ave., #2** has a fortified door for protection also. Affiant has also verified through controlled buy videos that **1848 Kearney Ave., #2** has a fortified door.

53. SOI #16 advised Affiant that since June 28, 2021, SOI #16 has personally observed CARL GRAYSON drive to the back of 1932 Taylor Ave, Racine WI and get “fronted” a half ounce to an ounce of crack cocaine by an individual SOI #16 positively identified as Tirawann Barker. SOI #16 stated that Tirawann Barker exited 1932 Taylor Avenue and gave CARL GRAYSON the crack cocaine. CARL GRAYSON then returned back to his residence at **1848 Kearney Ave., #2**. Also since June 28, 2021, SOI #16 advised that CARL GRAYSON made SOI #16 go pick up crack cocaine from Tirawann Barker on his behalf. SOI #16 went to the rear of 1932 Taylor Avenue and was “fronted” a half ounce of crack cocaine from Tirawann Barker. Tirawann Barker exited 1932 Taylor Avenue to provide the crack cocaine to SOI #16. SOI #16 then returned to CARL GRAYSON’s residence at **1848 Kearney Ave., #2** at which time SOI #16 turned the crack cocaine over to CARL GRAYSON. SOI #16 was shown a photograph of Tirawann Barker and SOI #16 positively identified Tirawann Barker as the individual who “fronted” the crack cocaine to CARL GRAYSON and SOI #16. Affiant knows based on his training and experience that “fronted” is a street term for being provided controlled substances without the exchange of money. Money is often due to the source of supply (SOS) at a later time, once the individual has profited from the drug sales.

54. On July 6, 2021, SOI #16 contacted Affiant and advised MARQUAN WASHINGTON came over to CARL GRAYSON’s residence, **1848 Kearney Ave, #2**, to utilize CARL GRAYSON’s vehicle to pick up a half kilo (kilogram) of cocaine. SOI #16 observed MARQUAN WASHINGTON bring back a half kilo (kilogram) of cocaine to **1848 Kearney Ave,**

#2 to “cook up.” Affiant knows based on his training and experience that “cook up” is a street term for cooking powder cocaine into crack cocaine.

55. SOI #16 told Affiant that s/he knows based on personal experience that the material being sold by CARL GRAYSON, MARQUAN WASHINGTON, MARIO JOHNSON, TERRY BRUMBY, and Tirawann Barker is crack cocaine.

### **15. Information Obtained From SOI #17**

56. On June 22, 2021, TFO Langendorf and TFO Keland conducted a debrief of SOI #17. SOI #17 identified a drug trafficking organization operating in the City of Racine consisting of but not limited to TERRY BRUMBY, MARIO JOHNSON, MARQUAN WASHINGTON, MICHAEL HARDIN, Akeem First, and PLAZE ANDERSON. SOI #17 had knowledge that the above individuals who are working together to sell large amounts of marijuana, powder cocaine, and crack cocaine to make large amounts of money. SOI #17 has personal knowledge of MARIO JOHNSON through ASHLEY WESTMORELAND.<sup>16</sup>

57. SOI #17 stated that since about January 2021, ASHLEY WESTMORELAND of **1829 Franklin Street** has allowed MARIO JOHNSON to store large quantities of cocaine at her residence and has delivered crack cocaine to clientele of MARIO JOHNSON on his behalf. On two occasions in June 2021, SOI #17 has personally observed 2-3 ounces of crack cocaine inside **1829 Franklin Street**. SOI #17 questioned ASHLEY WESTMORELAND about the crack cocaine who said she was keeping it (the crack cocaine) at her residence for MARIO JOHNSON. On June 17, 2021, SOI #17 was at **1829 Franklin Street** with ASHLEY WESTMORELAND and

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<sup>16</sup> SOI #17's information is credible and reliable because SOI #17 has given information concerning individuals involved in illegal activities which has been independently verified through this investigation. SOI #17 has provided information that has led to at least 6 pending felony arrests in the last 12 months. Affiant isn't aware of anytime SOI #17 has been untruthful with law enforcement. SOI #17 is cooperating with law enforcement for monetary consideration. SOI #17 has adult convictions for misdemeanor Resisting / Obstructing, felony Robbery with Threat of Force, misdemeanor Obstructing, and felony Battery by Prisoners.

MARIO JOHNSON. SOI #17 personally observed MARIO JOHNSON in possession of a silver and black colored 9mm handgun in his pants pocket.

58. On August 18, 2021, CHS #17 contacted TFO Keland regarding an observation of a sale of crack cocaine made by MICHAEL HARDIN at **1312 Russet Street**. CHS #17 stated that within the last 48 hours, CHS #17 had personally observed MICHAEL HARDIN sell an “8-ball” of crack cocaine from **1312 Russet Street**. Based on his training and experience, and the investigation to date, Affiant knows an “8-ball” is a street term for 3.5 grams of crack cocaine.

#### **16. Information Obtained From SOI #18**

59. On July 19, 2021, TFO Langendorf and Affiant conducted a debrief of SOI #18. SOI #18 provided information on a group of individuals, including MARQUAN WASHINGTON, BRIAN PHILLIPS, CARL GRAYSON, GERARDO LARA, and Jesus Lara, who are working together to distribute controlled substances in the City of Racine. SOI #18 stated that for the last five years, BRIAN PHILLIPS has obtained 2 kilos (kilograms) of cocaine twice a month from a local Mexican guy by the name of “Dineroo.” “Dineroo” and his twin brother have a cartel connection in Illinois that BRIAN PHILLIPS and “Munch” (MARQUAN WASHINGTON) gets their kilos from. Recently, “Dineroo’s” girlfriend, “Sarah” was recently arrested for having fentanyl. Affiant knows based on the investigation that SARAH BECKIUS was recently arrested with controlled substances and is dating GERARDO LARA. Affiant is also aware based on the investigation that GERARDO LARA has a twin brother, JESUS LARA.

60. SOI #18 stated that “Munch” (MARQUAN WASHINGTON) and “Pops” (CARL GRAYSON) have been involved in the group obtaining kilos from “Dineroo.” “Munch” (MARQUAN WASHINGTON) would also get 2 kilos (kilograms) of cocaine twice a month from “Dineroo” with BRIAN PHILLIPS. SOI #18 stated “Munch” (MARQUAN WASHINGTON),

BRIAN PHILLIPS, and “Dineroo” all work together to sell cocaine, but about 3 months ago something happened with “Munch” (MARQUAN WASHINGTON) and “Dineroo” and they’re no longer dealing directly with each other. SOI #18 stated “Dineroo” charges \$38,000 - \$42,000 per kilo (kilogram) of cocaine.<sup>17</sup> SOI #18 stated that “Munch” (MARQUAN WASHINGTON), “Pops” (CARL GRAYSON), and “Dineroo” always carry a gun and that we (law enforcement) need to be careful around them.

61. Affiant reviewed GERARDO LARA’S Facebook page. The page has pictures that are consistent with LARA’s appearance. On July 16, 2021, a friend wrote, “Happy birthday bro bro aka dineroo.” Based on this Facebook post and the investigation by law enforcement, Affiant believes “Dineroo” is GERARDO LARA.

#### **17. Information Obtained From SOI #21**

62. On August 25, 2021, Affiant, RAPD TFO Rybarik, MPPD TFO Haleen, and RCSD Det Kent Milam conducted a debrief of SOI #21 who had direct and personal knowledge of large level drug traffickers within Racine, WI. SOI #21 stated that BRIAN PHILLIPS is a kilo (kilogram) level drug dealer and is the biggest cocaine and heroin drug dealer in the City of Racine. SOI # 21 stated that BRIAN PHILLIPS is supplied his kilos (kilograms) of cocaine and heroin from a Hispanic male identified as GERARDO LARA. In 2019, SOI #21 has personally travelled with BRIAN PHILLIPS to Milwaukee, Wisconsin, to pick up a kilo (kilogram) of cocaine from GERARDO LARA. Since 2019, BRIAN PHILLIPS has been getting several more kilos (kilograms) of cocaine and heroin from GERARDO LARA. SOI #21 knows BRIAN PHILLIPS

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<sup>17</sup> SOI #18’s information is credible and reliable because SOI #18 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #18 has also provided information against SOI#18’s penal interest. SOI #18 is cooperating in exchange for consideration on felony charges and has received no monetary consideration. SOI #18 has no adult felony or misdemeanor convictions.



is often fronted cocaine and heroin, and when BRIAN PHILLIPS sells the drugs, he later repays GERARDO LARA for the product. Approximately 2 weeks ago, SOI #21 observed BRIAN PHILLIPS in possession of four (4) kilos (kilograms) of cocaine and two (2) kilos (kilograms) of heroin. SOI #21 knows BRIAN PHILLIPS to utilize Parthenia (Tina) Phillips' house 2101 Romaine Ave Upper Unit, Racine, Wisconsin, to stash his drugs and money. SOI #21 knows BRIAN PHILLIPS to sell his cocaine and heroin to numerous people on the Northside of Racine, WI. SOI #21 advised BRIAN PHILLIPS recently sold a kilo (kilogram) of cocaine to Deontaye Famous for \$30,000 dollars. SOI #21 knows BRIAN PHILLIPS to also sell large amounts of cocaine, such as a kilo (kilogram) to Garret Walker and Tyrann Mosley, on a frequent basis. SOI #21 stated BRIAN PHILLIPS also utilizes JASMINE GONZALES as one of his main drug runners.<sup>18</sup>

63. SOI #21 identified that MARQUAN WASHINGTON, TERRY BRUMBY, MARIO JOHNSON, and MICHAEL HARDIN all work together to sell cocaine, crack cocaine and marijuana and all pool their money together to purchase and distribute larger loads of controlled substances for increased drug proceeds. MARQUAN WASHINGTON, TERRY BRUMBY, MARIO JOHNSON, and MICHAEL HARDIN have been selling cocaine and marijuana together for several years within Racine, WI.

64. On September 9, 2021, CHS #21 observed BRIAN PHILLIPS at his stash house of **2101 Romaine Ave., Racine, WI**. CHS #21 knows BRIAN PHILLIPS to go to his stash house of **2101 Romaine Ave., Racine, WI**, before 2:00 pm because BRIAN PHILLIPS is scared of

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<sup>18</sup> SOI #21's information is credible and reliable because SOI #21 has given information against SOI #21's penal interest and provided information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. SOI #21 is cooperating with law enforcement in exchange for consideration on felony charges. SOI #21 has adult felony convictions for Manufacture/Deliver THC, 2<sup>nd</sup> Degree Recklessly Endangering Safety, and misdemeanor convictions for Criminal Damage to Property, OWI-3<sup>rd</sup>, OWI-2<sup>nd</sup>, Bail Jumping, Disorderly Conduct, and Obstructing an Officer 2x.

second shift police officers. Affiant is aware that Racine Police Department has a shift that ends at 2:00 pm.

### **18. Information Obtained From SOI #22**

65. On September 2, 2021, TFO Matson, TFO Haleen, FBI SA Joe Costible and Affiant conducted a debrief of SOI #22. SOI #22 identified GERARDO LARA a large kilogram level cocaine dealer in the Racine, Wisconsin, and Milwaukee, Wisconsin, area. SOI #22 was personally around GERARDO LARA from 2017 – 2019. Since 2017, SOI #22 knew GERARDO LARA to sell large amounts (kilograms) of cocaine. On two occasions during that time, SOI #22 went over to GERARDO LARA'S farm, **8761 W 7 Mile Rd., Franksville, WI**. During one of the visits to GERARDO LARA'S **8761 W 7 Mile Rd., Franksville, WI**, SOI #22 observed GERARDO LARA retrieve a bag of cocaine (described as a handful) out of alfalfa horse feed in a back horse barn. GERARDO LARA showed SOI #22 the cocaine and SOI #22 also observed additional individually packaged bags of cocaine in a McDonald's bag that GERARDO LARA retrieved. SOI #22 heard that GERARDO LARA met the "Godfather" who would provide him the kilos (kilograms) of cocaine. SOI #22 knows that due to GERARDO LARA being a large level kilo (kilogram) drug dealer, he has lots of people selling cocaine for him.

66. SOI #22 advised that GERARDO LARA always talked about selling kilos (kilograms) of cocaine and possessing and selling guns. SOI #22 knew GERARDO LARA and his brother, identified as JESUS LARA, to always have a gun on them, whether it was in a car or wherever. GERARDO LARA has told SOI #22 that JESUS LARA is "a killer" and that he (JESUS LARA) gets amped up about everything. GERARDO LARA has also talked about killing people and that his brother (JESUS LARA) just being a bad person. On 10-12 occasions, SOI #22 has observed GERARDO LARA in possession and spending large amounts of money, such as over

\$5,000 cash at the casino. SOI #22 knows GERARDO LARA to utilize two cell phones: one personal cell phone and one drug phone, which the number (phone number) is changed every month (for his drug phone).<sup>19</sup>

### **19. Information Obtained From Tipsters**

67. On May 9, 2021, Affiant became aware of a Racine County Crime Stoppers Tip regarding CARL GRAYSON. The Tipster stated Carl, a black male, is selling crack cocaine from an apartment located at the corner of Kearney and Dekoven Avenue. Based on their training and experience, and the investigation to date, case agents believe this address is **1848 Kearney Ave.** The Tipster provided Carl's phone number as 262-417-3060, which Affiant knows belongs to CARL GRAYSON.

68. On June 29, 2021, Racine Police Department received a Crime Stoppers tip regarding BRIAN PHILLIPS. The Tipster indicated BRIAN PHILLIPS was the cause of several overdose deaths in Racine. Furthermore, "Jasmine" is one of his (BRIAN PHILLIPS') runners. The Tipster states he (BRIAN PHILLIPS) has a black 9mm Taurus. Affiant knows based on his training and experience that a "runner" is a street term for someone who works directly with a drug dealer to distribute the controlled substances on his/her behalf. Once the "runner" delivers the controlled substances the money from the drug deal is often returned to the main supplier. A large level drug dealer often utilizes drug runners to reduce the risk of being arrested with the controlled substances. Based on their training and experience, and the investigation to date, case agents believe that the "Jasmine" identified in the tip is JASMINE GONZALES.

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<sup>19</sup> SOI #22's information is credible and reliable because SOI #22 has provided information concerning individuals involved illegal activities that have been corroborated by this investigation and other sources of information. SOI #22 is cooperating with law enforcement in exchange for monetary payment. SOI #22 has no adult felony convictions or misdemeanor convictions.

69. On July 28, 2021, Affiant became aware of a Racine County Crime Stoppers Tip regarding BRIAN PHILLIPS being responsible for a fatal drug overdose at Seeker Motel. The Tipster stated he (BRIAN PHILLIPS) also has a drug runner named “Jaz” who is a lil (little) short woman. Affiant knows based on the investigation JASMINE GONZALEZ works directly with BRIAN PHILLIPS to distribute crack cocaine and heroin within the City of Racine. The Tipster advised this is his (BRIAN PHILLIPS’) fifth overdose that he has been the cause of. Affiant is aware that Guanin Jordan-Perez, died of a suspected drug overdose on July 19, 2021, at Seeker Motel, 1700 Durand Avenue., Racine, Wisconsin. Based on their training and experience, and the investigation to date, case agents believe that the “Jaz” identified in the tip is JASMINE GONZALES.

**C. Law enforcement contacts with members of the DTO.**

70. Throughout law enforcements’ investigation into the DTO, several members of the conspiracy were arrested and interviewed. Information obtained during these arrest and interviews confirmed information provided by the SOIs. For example:

a. On December 3, 2020, Affiant became aware that PLAZE ANDERSON was arrested for possession with intent to deliver cocaine during a traffic stop. PLAZE ANDERSON was in possession of 0.8 grams of suspected crack cocaine, two cell phones, and \$1000 dollars of US Currency. PLAZE ANDERSON was operating a rental vehicle at the time of the traffic stop, which was rented by a family member of Marquan Washington. PLAZE ANDERSON was subsequently charged in *State of Wisconsin v. Plaze Anderson*, Racine County Case No. 2020CF1541.

b. As another example, on March 14, 2021, Akeem First was the victim of shooting at Sixth Street / Villa Street in Racine, Wisconsin. During the investigation, it was determined that First sustained a nonlife-threatening gunshot wound. It was determined First was with MARIO JOHNSON and MARQUAN WASHINGTON when Akeem First was shot.

c. As another example, on March 26, 2021, a traffic stop was conducted on the vehicle in which Akeem First was a passenger. While attempting to stop the vehicle, a handgun was thrown from the vehicle and later recovered. Following Akeem First’s arrest, law enforcement obtained a state search warrant for a forensic examination of his phone

(262-412-6795). Akeem First had several members of the DTO as contacts and telephone numbers in his phone, including: “M2” (262) 497-2716 (MARQUAN WASHINGTON), “Munch” (310) 270-5538 (MARQUAN WASHINGTON), “Mojo” (262) 676-4482 (MICHAEL HARDIN), “Roe” (262) 664-1177 (MARIO JOHNSON), “Roe2” (262) 456-8568 (MARIO JOHNSON), “Pops” (262) 417-3060 (CARL GRAYSON), “T-Nice” (262) 234-8731 (TERRY BRUMBY), and (262) 664-3328 (BRIAN PHILLIPS). There were numerous messages to other contacts demonstrating Akeem First was selling drugs. One message was sent from MARQUAN WASHINGTON to Akeem First that contained a video showing bundles of money (figure 1).



(figure 1)

d. Also located in Akeem First’s phone is a recorded rap song titled Ace – RiskTaker. Akeem First rapped about the “trap door” (drug house), “Pops” (CARL GRAYSON), using and selling “dope” and “zips” (slang for cocaine), making money, that “the Feds trying to take a peek” (investigate him)”and providing PLAZE ANDERSON drugs to sell once released. Also located in First’s phone were several videos and photos depicting him in possession of large amounts of cash (figures 2 and 3) and a picture of a firearm (figure 4).



(figure 2)



(figure 3)



(figure 4)

e. On April 7, 2021, Village of Mount Pleasant Police Department TFO Mark Haleen and RAPD TFO Scott Keland located and interviewed MARIO JOHNSON at **1915 Jay Eye See Avenue** regarding Akeem First being shot. During the interview, MARIO JOHNSON told law enforcement, he (MARIO JOHNSON) lives at **1915 Jay Eye See Avenue, Upper Unit**.

f. On April 19, 2021, Affiant became aware that Racine County Sheriff Deputy Austin Isferding conducted a traffic stop on JESUS LARA. During the traffic stop JESUS LARA was found to be in possession of suspected marijuana and a handgun. JESUS LARA was arrested for possession of THC, possession of drug paraphernalia, and carrying a concealed weapon. JESUS LARA provided his address as **8761 W 7 Mile Road, Franksville, Wisconsin**. JESUS LARA was charged regarding this offense in *State of Wisconsin v. Jesus Lara*, Racine County Case No. 2021CM546.

g. On May 7, 2021, SARAH BECKIUS was arrested on May 7, 2021, and possessed 12.2 grams of cocaine. SARAH BECKIUS was subsequently charged in *State of Wisconsin v. Sarah Beckius*, Racine County Case No. 2021CF000785 with Possession with Intent to Deliver Narcotics as well as several other felony and misdemeanor offenses. TFO Haleen reviewed and listened to jail/prison phone calls from SARAH BECKIUS and determined her to be in a dating relationship with GERARDO LARA, and that GERARDO LARA utilizes cellular phone number 262-598-7249.

h. On September 30, 2021, TFO Keland and TFO Haleen conducted a traffic stop on SARAH BECKIUS and arrested her on a valid outstanding warrant. During the arrest, BECKIUS was in possession of an Apple iPhone 12, which was collected as evidence. TFO Haleen subsequently completed a federal search warrant for SARAH BECKIUS' cell phone. TFO Haleen is aware that a preliminary review of the forensic extraction located messages between SARAH BECKIUS and GERARDO LARA'S cellular telephone number in which GERARDO LARA directs SARAH BECKIUS to conduct numerous drug deals on his behalf. Several photos of large amounts of cash were also located on SARAH BECKIUS' phone, including one from December 31, 2020, that depicts GERARDO LARA holding bundles of cash, while more cash is fanned out on the floor (figure 5). Another photograph captures SARAH BECKIUS holding a bundle of cash on August 21, 2021. (figure 6) Law enforcement also located a photo dated August 16, 2021, which depicts a white substance that is consistent with cocaine (figure 7). Law enforcement also located photos of firearms from Sarah Beckius' phone, including a black Taurus G2c with an extended magazine taken on April 12, 2021 (figure 8), and a Zastava Arms USA PAP M90 (AK-27 Variant) taken on April 17, 2021 (figure 9).





(Figure 5)



(Figure 6)



(Figure 7)



(figure 8)



(figure 9)

#### **D. Controlled Drug Buys**

71. Throughout the investigation, law enforcement utilized confidential human sources (CHSs) to conduct controlled drug buys from several members of the drug trafficking organization.



During the numerous controlled buys, law enforcement observed members of the drug trafficking organization: (1) sharing residences to store drugs and drug proceeds and to manufacture and package the drugs; (2) using a joint source of supply of controlled substances; (3) the fronting of drugs to each other; (4) serving each other's drug clientele; (5) the sharing of the drug supplies, drug packaging and rental cars for drug sales; and (6) protecting members from law enforcement detection. Below is a summary of these observations by law enforcement by TARGET LOCATION:

**1. 8761 W 7 Mile Rd., Franksville WI**

72. On September 21, 2021, TFO Haleen observed GERARDO LARA at **8761 W 7 Mile Rd., Franksville WI**. Acting under the direction and control of law enforcement, CHS #22 went to **8761 W 7 Mile Rd., Franksville, WI** and subsequently made contact with GERARDO LARA. CHS #22 requested to purchase 1.5 ounces of cocaine from GERARDO LARA. GERARDO LARA informed the CHS #22 the cost would be \$2,000 for the 1.5 ounces of cocaine, but he didn't have the cocaine at that moment and GERARDO LARA would contact the CHS #22 later in the day. CHS #22 also inquired about purchasing a half kilogram of cocaine. GERARDO LARA advised that he could also sell the CHS #22 a half kilogram for \$18,000.

**2. 1604 Deane Blvd, Racine, WI**

73. On June 17, 2021, CHS #19 was utilized to purchase 0.7 grams of crack cocaine and 0.7 grams of fentanyl from BRIAN PHILLIPS. CHS #19 called BRIAN PHILLIPS at 262-977-5936, however JASMINE GONZALES answered the phone. CHS #19 requested \$40 dollars of crack cocaine and \$60 dollars of heroin from JASMINE GONZALES. GONZALES advised the CHS #19 she would be there shortly. BRIAN PHILLIPS and JASMINE GONZALES met with the CHS #19 in the 2200 block of Washington Avenue and completed the drug transaction. During

the drug transaction the CHS #19 handed BRIAN PHILLIPS the \$100 dollars and BRIAN PHILLIPS provided the CHS #19 the crack cocaine and heroin.<sup>20</sup>

74. On June 30, 2021, CHS #19 acting under the direction and control of law enforcement called BRIAN PHILLIPS at 262-977-5936. CHS #19 requested to purchase \$100 dollars of crack cocaine from BRIAN PHILLIPS. PHILLIPS advised the CHS #19 he would be there shortly. BRIAN PHILLIPS and JASMINE GONZALES met with the CHS #19 in the 2200 block of Washington Avenue and completed the drug transaction. CHS #19 handed BRIAN PHILLIPS the \$100 dollars and BRIAN PHILLIPS provided the CHS #19 0.7grams of crack cocaine.

75. On July 12, 2021, CHS #19 acting under the direction and control of law enforcement called BRIAN PHILLIPS at 262-977-5936. CHS #19 requested to purchase \$60 dollars of crack cocaine from BRIAN PHILLIPS. BRIAN PHILLIPS advised the CHS #19 he would be there in about 20 minutes. BRIAN PHILLIPS met with the CHS #19 in the 2200 block of Washington Avenue and completed the drug transaction. During the drug transaction, the CHS #19 handed BRIAN PHILLIPS the \$60 dollars and BRIAN PHILLIPS provided CHS #19 0.8 grams crack cocaine.

76. On August 31, 2021, CHS #20 acting under the direction and control of law enforcement contacted BRIAN PHILLIPS at 262-977-5936 to purchase \$140 of crack cocaine. BRIAN PHILLIPS spoke to the CHS #20 agreed to the transaction. BRIAN PHILLIPS, "MANIAC," and unknown females met CHS #20 at a predetermined location utilizing a silver

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<sup>20</sup> CHS #19's information is credible and reliable because CHS #19 has given information concerning individuals involved in illegal activities which has been independently verified through this investigation. CHS #19 cooperated with law enforcement in exchange for consideration on felony charges. CHS #19 has prior adult felony convictions for False Swearing and Issuance of Worthless Checks, and adult misdemeanor convictions for two Theft offenses and a Battery.

Chevy Malibu bearing Wisconsin registration AMD-5959. BRIAN PHILLIPS was positively identified within the Chevy Malibu. “MANIAC” made contact with CHS #20 and gave “MANIAC” the \$140 dollars for the crack cocaine. “MANIAC” provided CHS #20 with crack cocaine and forced CHS #20 to use the crack cocaine in his presence to ensure CHS #20 wasn’t working with law enforcement. “MANIAC” provided CHS #20 1.3 grams of crack cocaine on BRIAN PHILLIPS’ behalf, which is the total amount after CHS #20 was forced to use the illegal drug for his/her safety.<sup>21</sup>

77. On September 3, 2021, CHS #20 acting under the direction and control of law enforcement contacted DEBRA URNESS at 262-977-5936 to purchase \$140 of crack cocaine. DEBRA URNESS answered and advised CHS #20, she was waiting on “B” (BRIAN PHILLIPS). Eventually DEBRA URNESS left her residence of **1604 Deane Blvd** and responded to the predetermined buy location. CHS #20 made contact with the vehicle and obtained 2.6 grams of crack cocaine from “MOM,” who was within URNESS’ vehicle.

78. On September 22, 2021, CHS #21 advised that BRIAN PHILLIPS was in Puerto Rico and JASMINE GONZALES was running drugs while he was gone. JASMINE GONZALES told CHS #21 she made BRIAN PHILLIPS \$5,000 by selling drugs while he was gone. CHS #20 attempted to contact BRIAN PHILLIPS at 262-977-5936 to purchase \$120 of crack cocaine, but a male, later believed to be Garrett Walker, aka “Foe,” answered the phone. The male directed CHS #20 to the “Plasma Center.” Prior to CHS #20 arriving at the “Plasma Center” the male called CHS #20 and directed CHS #20 to Republic / Blaine Ave. CHS #20 then met with JASMINE

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<sup>21</sup> <sup>21</sup> CHS #20’s information is credible and reliable because CHS #20 has given information concerning other individuals involved in illegal activities that have been corroborated by this investigation and other sources of information. CHS #20 has conducted multiple controlled purchases of controlled substances captured on video/audio recordings further corroborating CHS #20’s statements. CHS #20 is cooperating with law enforcement in exchange for monetary payment. CHS #10 has no felony or misdemeanor convictions.

GONZALES at the buy location. CHS #20 provided JASMINE GONZALES with \$120 and JASMINE GONZALES delivered 0.8 grams of crack cocaine to CHS #20.

79. On October 5, 2021, CHS #20 purchased 1.2 grams of crack cocaine from Brian Phillips for \$120. BRIAN Phillips arrived in his blue dodge Dakota NZ6772 and completed the drug transaction.

### **3. 928 Delamere Ave, Racine, WI - Front Unit and Back Unit**

80. On April 14, 2021, CHS #6, acting under the direction and control of law enforcement, contacted MARQUAN WASHINGTON at 262-497-2716 to arrange the purchase of crack cocaine. WASHINGTON directed CHS #6 to **928 Delamere, Racine, WI**. Once at the location CHS #6 purchased crack cocaine from WASHINGTON.

81. On April 23, 2021, CHS #6 acting under the direction and control of law enforcement, purchased 2.8 grams of crack cocaine from MARQUAN WASHINGTON for \$150. CHS #6 called MARQUAN WASHINGTON at 262-497-2716 and then met with WASHINGTON in the 1900 block of Linden Ave. Case agents believe that the buy occurred on Linden Avenue because there was an unrelated police presence near his residence of **928 Delamere Ave**.

### **4. 1915 Jay Eye See Ave, Upper Unit,, Racine, WI, and 1829 Franklin St, Racine, WI**

82. On June 4, 2021, CHS #7, acting under the direction and control of law enforcement, called MARIO JOHNSON at 262-456-8568 and requested to purchase crack cocaine from MARIO JOHNSON. CHS #7 told MARIO JOHNSON that MICHAEL HARDIN was out of town. MICHAEL HARDIN told CHS #7 to contact MARIO JOHNSON to obtain crack cocaine. CHS #7 had to call MICHAEL HARDIN who in return had to call MARIO JOHNSON for CHS #7 to set up the purchase. Eventually, after MICHAEL HARDIN had set up the deal,

CHS #7 was able to contact MARIO JOHNSON at the same above number and was directed to the area of Byrd Ave and Perry Ave where the transaction for 29.1 grams was completed.

83. On June 7, 2021, CHS #7 acting under the direction and control of law enforcement, contacted MARIO JOHNSON at 262-456-8568 and requested a price of an ounce of crack cocaine. MARIO JOHNSON stated \$1450 and directed CHS #7 to CARL GRAYSON's residence at **1848 Kearney Ave.** While waiting for MARIO JOHNSON to arrive, CHS #7 called MARIO JOHNSON at the above number and asked how long it would be until MARIO JOHNSON arrived. MARIO JOHNSON replied, "Shortie just pulled up." Moments later, ASHLEY WESTMORELAND arrived in a silver Kia Rental vehicle and sold CHS #7 28 grams of crack cocaine on behalf of MARIO JOHNSON. CHS #7 observed ASHLEY WESTMORELAND with a second ounce of crack cocaine. After ASHLEY WESTMORELAND completed the transaction, ASHLEY WESTMORELAND went into **1848 Kearney Avenue.** CHS #7 advised that ASHLEY WESTMORELAND is one of MARIO JOHNSON's girlfriends and Affiant had previously observed MARIO JOHNSON at her address, **1829 Franklin St., Racine, WI.**

84. On June 15, 2021, CHS #7, acting under the direction and control of law enforcement, contacted MARIO JOHNSON at 262-456-8568 and requested a price of an ounce of crack cocaine. MARIO JOHNSON stated "the same thing," which based on prior controlled buys, was \$1,450 dollars. MARIO JOHNSON stated, "he's going to grab it (the crack cocaine) now, so 10 minutes." Surveillance units observed MARIO JOHNSON leave his residence of **1915 Jay Eye See Avenue,** and immediately drive over to ASHLEY WESTMORELAND's residence of **1829 Franklin Street.** Surveillance units observed MARIO JOHNSON make a short-term visit at **1829 Franklin Street.** MARIO JOHNSON then called CHS #7 and directed CHS #7 to the area around La'Tapatia Restaurant, 1951 Mead St, to complete the drug transaction. MARIO JOHNSON then

had CHS #7 follow him to the area of 16<sup>th</sup>/Packard to complete the drug transaction. At 16<sup>th</sup> and Packard, CHS #7 got into MARIO JOHNSON's vehicle to complete the drug transaction. Once CHS #7 was inside MARIO JOHNSON's vehicle, MARIO JOHNSON indicated he saw police surveillance units and told CHS #7 to get out of the area. Due to MARIO JOHNSON observing police surveillance units, MARIO JOHNSON didn't complete the drug transaction with CHS #7.

85. On July 11, 2021, Affiant was contacted by CHS #7, who advised on the evening of July 10, 2021, CHS#7 came in contact with MARQUAN WASHINGTON and MARIO JOHNSON. During their interaction, MARQUAN WASHINGTON and MARIO JOHNSON were accusing and threatening CHS #7 as being "the police" (police informant). The following day, on 07/11/2021 CHS #7 received a phone call from a friend. CHS #7 was informed by his/her friend that MARQUAN WASHINGTON and MARIO JOHNSON were armed and driving around in a black truck looking for CHS #7.

86. On August 23, 2021, CHS #17 acting under the direction and control of law enforcement contacted ASHLEY WESTMORELAND at 262-331-9302 and requested a quarter ounce (7.0 grams) of cocaine. ASHLEY WESTMORELAND advised she needed to get the cocaine from MARIO JOHNSON to give to CHS #17. ASHLEY WESTMORELAND advised the price for the cocaine was going to be \$550, which \$500 was going to MARIO JOHNSON and \$50 for herself for middling the transaction. CHS #17 picked up ASHLEY WESTMORELAND who took CHS #17 to MARIO JOHNSON'S residence, **1915 Jay Eye See Avenue**. CHS #17 gave ASHLEY WESTMORELAND the \$550. While at **1915 Jay Eye See Avenue**, MARIO JOHNSON told ASHLEY WESTMORELAND to meet him at the 12<sup>th</sup> Street Store (12<sup>th</sup> St / S Memorial Dr).. CHS #17 took ASHLEY WESTMORELAND to 12<sup>th</sup> Street and South Memorial Drive, where she obtained the cocaine from MARIO JOHNSON within his white Jeep.

WESTMORELAND then provided CHS #17 7.6 grams of cocaine that came from MARIO JOHNSON.

87. On August 27, 2021, CHS #17, acting under the direction and control of law enforcement, contacted ASHLEY WESTMORELAND at 262-331-9302 and requested a half ounce (14.0 grams) of cocaine. WESTMORELAND contacted MARIO JOHNSON, who advised her that he only had a “seven” (7.0 grams) left. ASHLEY WESTMORELAND relayed this information to CHS #17, who agreed to purchase 7.0 grams instead of 14.0 grams. WESTMORELAND later contacted CHS #17 and advised him/her that they obtained the cocaine from MARIO JOHNSON and that he/she could come by her residence to purchase it. ASHLEY WESTMORELAND advised the price for the 7.0 grams of cocaine was \$550. CHS #17 went to ASHLEY WESTMORELAND’S residence, **1829 Franklin St**, to purchase the cocaine. While inside **1829 Franklin St**, CHS #17 provided ASHLEY WESTMORELAND \$550 dollars in exchange for 8.4 grams of cocaine.

#### **5. 1848 Kearney Ave., #2, Racine WI**

88. On April 21, 2021, CHS #6, acting under the direction and control of law enforcement. called MARQUAN WASHINGTON at 262-497-2716 and requested to purchase \$150 worth of crack cocaine. WASHINGTON explained that he was in Kenosha and that CHS #6 should go to “Pops” house and that “Pops” will bring the crack cocaine to the door. From the investigation law enforcement was already aware that “Pops” is CARL GRAYSON and he resides at **1848 Kearney Ave., # 2**, in the City of Racine. CHS #6 went to **1848 Kearney Ave., #2 (?)**, and purchased 1.5 grams of crack cocaine from CARL GRAYSON for \$150.

89. On April 26, 2021, CHS #10, acting under the direction and control of law enforcement, contacted CARL GRAYSON at 262-417-3060 and asked if CARL GRAYSON had



controlled substances for sale. CHS #10 went to **1848 Kearney Ave, #2** and purchased the 1.0 grams of crack cocaine from CARL GRAYSON. While CHS #10 was inside of **1848 Kearney Ave, #2**, a drug user showed up to purchase \$40 worth of crack cocaine from CARL GRAYSON. According to CHS #10, CARL GRAYSON was upset that this customer did not call ahead of time so that CARL GRAYSON could have the crack bagged up and ready.

90. On April 27, 2021, CHS #10, acting under the direction and control of law enforcement, called CARL GRAYSON at 262-417-3060 and confirmed CARL GRAYSON had crack for sale. CHS #10 went to **1848 Kearney Ave, #2**, and purchased 0.9 grams of crack cocaine from CARL GRAYSON. According to CHS#10, CARL GRAYSON had additional packaging materials and crack cocaine on a plate in the living room.

91. On April 30, 2021, CHS #10 acting under the direction and control of law enforcement contacted CARL GRAYSON at 262-417-3060. CHS #10 drove to **1848 Kearney Ave, #2** and was met by CARL GRAYSON in the hallway outside of CARL GRAYSON's apartment. CHS #10 purchased the crack cocaine and CARL GRAYSON told CHS #10 "MUNCH" (MARQUAN WASHINGTON) was inside the apartment "cooking" referring to why the deal happened in the hallway.

92. On May 7, 2021, CHS #13 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 310-270-5538 and requested to purchase \$100 worth of crack cocaine. Utilizing previously installed video surveillance, Affiant watched MARQUAN WASHINGTON exit **1848 Kearney Ave**, enter into a Dodge Charger with WI Registration AKL-7619. MARQUAN WASHINGTON then drove to the Taylor Mart Store a few blocks away and meet with CHS #13 in the Dodge Charger where CHS #13 purchased 1.4 grams

of crack cocaine from MARQUAN WASHINGTON.<sup>22</sup>

93. On May 27, 2021, CHS#10 acting under the direction and control of law enforcement contacted CARL GRAYSON at 262-417-3060 and asked if CHS #10 could come by the house and CARL GRAYSON directed CHS # 10 to the rear door due to construction on the building. CHS #10 purchased \$50 worth of crack cocaine and \$60 worth of marijuana from CARL GRAYSON. While CHS #10 was inside of **1848 Kearney Ave, #2** with CARL GRAYSON; MARQUAN WASHINGTON came over to the residence and delivered 0.7 grams of crack cocaine to CARL GRAYSON.

94. On July 15, 2021, CHS #13 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 310-270-5538 and requested to purchase \$60 worth of crack cocaine. MARQUAN WASHINGTON then directed CHS #13 to meet him at **1848 Kearney Ave**. Utilizing previously installed video surveillance Affiant watched CHS #13 arrive at **1848 Kearney Ave** and enter into the front door. Once CHS #13 was inside **1848 Kearney Ave**, CHS #13 purchased 1.7 grams of crack cocaine from MARQUAN WASHINGTON.

95. On August 4, 2021, CHS #10 acting under the direction and control of law enforcement contacted CARL GRAYSON at 262-417-3060 prior to the meeting him and asked if CARL GRAYSON had controlled substances. CHS #10 went to **1848 Kearney Ave, #2** and purchased the 0.9 grams of crack cocaine from CARL GRAYSON. While CHS #10 was inside of **1848 Kearney Ave, #2**, CARL GRAYSON also had a \$40 bag of crack cocaine ready for a different drug client.

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<sup>22</sup> CHS #13's information is credible and reliable because CHS #13 is providing information based on CHS #13's personal knowledge and observations and said information has been corroborated by other sources during this investigation. CHS #13 is cooperating with law enforcement for monetary consideration. CHS #13 has no felony convictions or misdemeanor convictions.

96. On August 11, 2011, CHS #13 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 310-270-5538 and requested to purchase \$60 worth of crack cocaine. MARQUAN WASHINGTON directed CHS #13 to the front door of the building (**1848 Kearney Ave**). CHS #13 went to **1848 Kearney Ave** and called MARQUAN WASHINGTON a second time. MARQUAN WASHINGTON told the CHS #13 to ring the doorbell. CHS #13 meet with CARL GRAYSON inside **1848 Kearney Ave, #2**. CHS #13 gave CARL GRAYSON the \$60 dollars and CARL GRAYSON provided CHS #13 with 0.6 grams of crack cocaine on behalf of MARQUAN WASHINGTON.

97. On August 12, 2021, CHS #13 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 310-270-5538 and requested to purchase \$60 worth of crack cocaine. Initially MARQUAN WASHINGTON directed CHS #13 to **1848 Kearney Ave**. While CHS #13 was waiting at 1848 Kearney Ave, CHS #13 re-called MARQUAN WASHINGTON, who then directed the CHS #13 to come to **Jay Eye See Ave**. CHS #13 went to the **1900B Jay Eye See Ave** and met with MARQUAN WASHINGTON. While in front of **1915 Jay Eye See Ave**, CHS #13 gave MARQUAN WASHINGTON \$60 dollars and MARQUAN WASHINGTON provided CHS #13 with 0.5 grams of crack cocaine.

98. On August 17, 2021, CHS #13 acting under the direction and control of law enforcement contacted Affiant after previously receiving a phone call from MARQUAN WASHINGTON at 310-270-5538. During that phone call, CHS #13 advised MARQUAN WASHINGTON s/he would be looking to purchase crack cocaine later on in the day. Affiant then directed CHS #13 to place a recorded phone call back to MARQUAN WASHINGTON at 310-270-5538, however MARQUAN WASHINGTON didn't answer. Affiant directed CHS #13 to go to **1848 Kearney Ave** to make contact with CARL GRAYSON. CHS #13 meet with CARL

GRAYSON inside **1848 Kearney Ave, #2**. CHS #13 gave CARL GRAYSON the \$60 dollars and CARL GRAYSON provided CHS #13 with 0.5 grams of crack cocaine.

99. On September 1, 2021, CHS #13 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 310-270-5538 to purchase \$100 worth of crack cocaine. MARQUAN WASHINGTON agreed to the transaction and the meeting location was **1848 Kearney Ave**. CHS #13 followed MARQUAN WASHINGTON into the back door of **1848 Kearney Ave #2**, which is CARL GRAYSON'S known address. CHS #13 gave MARQUAN WASHINGTON the \$100 for 2.2 grams of crack cocaine. Upon entering the residence, CHS #13 observed CARL GRAYSON selling crack cocaine to a white male drug addict. MARQUAN WASHINGTON obtained a digital gram scale within **1848 Kearney Ave #2**, broke off smaller pieces of crack cocaine from a large piece of crack cocaine and weighed the crack cocaine to provide to CHS #13. MARQUAN WASHINGTON then obtained a clear plastic sandwich bag from within **1848 Kearney Ave., #2**, packaged the crack cocaine for the CHS #13 and provided 2.2 grams of crack cocaine to CHS #13.

#### **6. 1312 Russet Street, Racine, WI**

100. On April 8, 2021, CHS #6 acting under the direction and control of law enforcement contacted MARQUAN WASHINGTON at 262-497-2716. WASHINGTON answered the phone and CHS #6 asked to purchase marijuana. WASHINGTON told CHS #6 that MARQUAN WASHINGTON did not have any marijuana and directed CHS #6 to contact MICHAEL HARDIN ("Mojo"). MARQUAN WASHINGTON sent CHS #6 the phone number 262-676-4482 to contact MICHAEL HARDIN. CHS #6 called HARDIN, who answered and indicated that MARQUAN WASHINGTON had just contacted him and told him that CHS #6 would be calling. A short time later CHS #6 purchase 7.4 grams of marijuana from MICHAEL HARDIN for \$80. During the

controlled purchase of marijuana MICHAEL HARDIN was operating a 2018 Chevrolet Malibu with Wisconsin Registration AFE1716 which lists to Raven Luten at **2200 Washington Ave., Apt 212.**

101. On April 9, 2021, CHS #7 was utilized to purchase 14.3 grams (1/2 ounce) of cocaine from MICHAEL HARDIN for \$825. The controlled purchase occurred in CHS #7's vehicle behind **1312 Russet Street** in the City of Racine. Affiant is aware from this investigation that MICHAEL HARDIN stays at this address with his girlfriend. Additionally, HARDIN directed CHS #7 to bring him to two different areas in the City of Racine where HARDIN sold \$50 bags of cocaine to different people.

102. On April 29, 2021, CHS #7 acting under the direction and control of law enforcement contacted MICHAEL HARDIN at 262-676-4482 and asked to purchase one ounce of cocaine for \$1600. CHS #7 went to MICHAEL HARDIN's residence at **1312 Russet Avenue** and MICHAEL HARDIN entered CHS #7's vehicle to complete the transaction. During the transaction MICHAEL HARDIN told CHS #7 that MICHAEL HARDIN also had three pounds of marijuana for sale and discussed prices with CHS #7. Also, MICHAEL HARDIN explained a situation where two customers who did not get along showed up to buy marijuana at the same time. MICHAEL HARDIN explained that a fight nearly ensued in front of his residence and he was upset about it.

103. On May 12, 2021, CHS #7, acting under the direction and control of law enforcement., contacted MICHAEL HARDIN at 262-676-4482 and was directed MICHAEL HARDIN's residence at **1312 Russet Ave.** CHS #7 picked up MICHAEL HARDIN and brought him to **2200 Washington Ave**, where HARDIN went inside the building for several minutes and then came back out. MICHAEL HARDIN then provided CHS #7 with 28.8 grams of crack cocaine

in exchange for \$1380. During the controlled purchase MICHAEL HARDIN relays that one of his girlfriend's lives in the building.

104. On May 21, 2021, CHS #7, acting under the direction and control of law enforcement, picked up MICHAEL HARDIN at **1312 Russet Street** and drove him to the Pleasant Point Senior Living at 8500 Corporate Drive, Mt Pleasant, WI. HARDIN exited CHS #7's vehicle and entered into a gold Chevy Malibu with WI Registration AFE-1716 which lists to Raven Luten at **2200 Washington Ave, Apt 212**. CHS #7 followed MICHAEL HARDIN back to **2200 Washington Ave**, where MICHAEL HARDIN again briefly went inside and came out with 24.6 grams of crack cocaine. During this buy CHS #7 was told by MICHAEL HARDIN that MARIO JOHNSON does not really sell much marijuana anymore and that MARIO JOHNSON only gets the marijuana if MICHAEL HARDIN wants to sell it.

105. On June 15, 2021, CHS #7, acting under the direction and control of law enforcement, contacted MICHAEL HARDIN at 262-676-4482 and requested a price of an ounce of crack cocaine. HARDIN told CHS #7 it would be \$1,450. MICHAEL HARDIN tells CHS #7 that he's at his house (**1312 Russet St**), but he doesn't want to go grab it (the crack cocaine) until CHS #7 was around. Meanwhile, CHS #7 was attempting to purchase crack cocaine from MARIO JOHNSON as reference in paragraph 97. Once the controlled buy with MARIO JOHNSON failed to be completed, CHS #7 attempted to complete the controlled buy with MICHAEL HARDIN. MICHAEL HARDIN now gave CHS #7 an excuse to not be able to complete the drug transaction. Phone call detail records later indicated MARIO JOHNSON contacted MICHAEL HARDIN immediately after the attempted controlled buy with MARIO JOHNSON. CHS #7 advised everyone in the drug trafficking operation, including MARIO JOHNSON and MICHAEL HARDIN, communicate with each other and due to the circumstances MARIO JOHNSON told

MICHAEL HARDIN about the police surveillance during the attempted controlled buy.

106. On August 18, 2021, CHS #17 contacted TFO Keland regarding an observation of a sale of crack cocaine made by MICHAEL HARDIN at **1312 Russet St.** CHS #17 stated within the last 48 hours, s/he personally observed MICHAEL HARDIN sell an “8-ball” of crack cocaine from **1312 Russet St.** Affiant knows an “8-ball” is a street term for 3.5 grams of crack cocaine.

107. On August 19, 2021, CHS #17, acting under the direction and control of law enforcement, contacted MICHAEL HARDIN at 262-676-4482 and asked to purchase a 3.5 grams of cocaine. CHS #7 met MICHAEL HARDIN in the area of Grange Ave / Wright Ave in the City of Racine to complete the transaction. During the transaction, within MICHAEL HARDIN’S vehicle, the CHS #17 gave MICHAEL HARDIN the \$200 and MICHAEL HARDIN provided CHS #17 the 3.5 grams of cocaine. Affiant conducted a WI DOT record check of WI- AMJ 7939 which lists Artasia Delrece Echoles, at **1312 Russet St.,** Racine, WI, 53405. Affiant knows MICHAEL HARDIN to be currently dating Artasia Echoles and living with her at **1312 Russet St.**

#### **7. 1604 Deane Blvd., Racine, WI**

108. On September 8, 2021, CHS #20, acting under the direction and control of law enforcement, contacted BRIAN PHILLIPS at 262-977-5936 to purchase \$140 of crack cocaine. BRIAN PHILLIPS spoke to the CHS #20 and told CHS #20 to go to Chicago and Thor Avenue and to bring a pipe (crack cocaine smoking device). A short time later, BRIAN PHILLIPS texted CHS #20 to go to Deane (**1604 Deane Blvd**). CHS #20 went to **1604 Deane Blvd** and made contact with URNESS. CHS #20 provided DEBRA URNESS with \$140 dollars, however \$20 was returned to CHS #20 because DEBRA URNESS didn’t have enough crack cocaine. URNESS then provided CHS #20 with 1.8 grams of crack cocaine.



109. On September 10, 2021, CHS #20 acting under the direction and control of law enforcement attempted to contact BRIAN PHILLIPS at 262-977-5936 to purchase \$120 of crack cocaine, but no one answered. CHS #20 contacted DEBRA URNESS, who sells for BRIAN PHILLIPS, at 262-412-1294 to purchase \$120 of crack cocaine. DEBRA URNESS directed CHS #20 to the area of 17<sup>th</sup> and Quincy Ave. CHS #20 met with DEBRA URNESS and provided CHS#20 the \$120, and DEBRA URNESS delivered 1.3 grams of crack cocaine to CHS #20.

110. On September 10, 2021, CHS #20 was contacted by BRIAN PHILLIPS in regards of doing a favor for him. CHS #20 agreed to help BRIAN PHILLIPS out, and CHS #20 eventually met with DEBRA URNESS. CHS #20 and DEBRA URNESS drove to Pilot Travel Center, 13712 Northwestern Ave, Franksville, WI, and met with two male individuals with beards in a green GMC pickup truck. CHS #20 positively identified by photograph GERARDO LARA and his green GMC pickup truck. The other male took CHS #20 and DEBRA URNESS' cell phones and told CHS #20 to follow them. GERARDO LARA subsequently drove to the area of Northbrook, Illinois on Piper Lane. Once parked on Piper Lane, GERARDO LARA and the other male individual walked around the corner and returned with a box. GERARDO LARA placed the box into CHS #20's vehicle and told CHS #20 to drive back DEBRA URNESS' house. CHS #20 and DEBRA URNESS then drove back to Racine, WI with GERARDO LARA following the CHS #20. CHS #20 drove directly to DEBRA URNESS' house, **1604 Deane Blvd**. Once at **1604 Deane Blvd** the box was carried into **1604 Deane Blvd**. CHS #20 was provided his/her cell phone. CHS #20 believes due to the nature of the activity and knowledge of BRIAN PHILLIPS and DEBRA URNESS, the box likely contained a large amount of cocaine. CHS #20 was compensated \$150 by BRIAN PHILLIPS for this activity.

111. On September 14, 2021, CHS #20, acting under the direction and control of law

enforcement, attempted to contact BRIAN PHILLIPS at 262-977-5936 to purchase \$120 of crack cocaine, but DEBRA UNRESS answered the phone. DEBRA URNESS stated, "I got the phone...I got the phone." URNESS directed CHS #20 to Westtown Foods, 3326 16<sup>th</sup> St., Racine, WI. Law enforcement observed DEBRA URNESS leave **1604 Deane Blvd** and drove to the buy location in a blue Dodge Dakota, WI NZ6772, which lists to JERI BALDERAS. CHS #20 met with DEBRA URNESS and provided her with \$120 in exchange for 1.1 grams of crack cocaine.

**8. 700 W Michigan St, W405, Milwaukee, WI / 2327 Meachem St, Upper Unit, Racine, WI**

112. On September 24, 2021, CHS #23 acting under the direction and control of law enforcement contacted MICHAEL WRIGHT at 262-234-1793 to set up a cocaine purchase. CHS #23 and MICHAEL WRIGHT made an agreement to purchase two ounces of cocaine for \$2,200 and MICHAEL WRIGHT would "front" a third ounce of cocaine to CHS #23. MICHAEL WRIGHT met with the CHS and provided 84.4 grams of cocaine to the CHS #23 in exchange for \$2,200. Approximately 1 hour prior to the controlled buy, TFO Haleen and Affiant observed MICHAEL WRIGHT and GERARDO LARA in the 400B of Hayes Ave, Racine WI. Shortly thereafter, TFO Haleen and Affiant observed both MICHAEL WRIGHT (driver) and GERARDO LARA (front passenger) drive out of the area. Earlier in the morning on the same day, TFO Haleen observed GERARDO LARA'S green GMC pickup truck (12031MU) parked at MICHAEL WRIGHT'S residence at 1650 Monroe Ave. Furthermore, TFO Haleen reviewed the pen register/trap and trace information and found MICHAEL WRIGHT to be a frequent contact on both phones utilized by GERARDO LARA. Based on debriefs of SOI #6 and #8, discussed previously, Affiant has knowledge that MICHAEL WRIGHT was working with GERARDO LARA to sell and distribute cocaine prior to going to prison in 2016. MICHAEL WRIGHT

introduced BRIAN PHILLIPS to GERARDO LARA for cocaine trafficking purposes.<sup>23</sup>

113. On September 29, 2021, CHS #23 acting under the direction and control of law enforcement contacted MICHAEL WRIGHT at 262-234-1793 to set up the purchase of 3 ounces of cocaine for \$3,300. Prior to the buy, MICHAEL WRIGHT'S known rental vehicle, a gray Nissan Altima, bearing California license plate 8RAM346, was located parked directly outside of **700 W Michigan St., Milwaukee WI**. Surveillance units observed MICHAEL WRIGHT leave directly from **700 W Michigan St., Milwaukee WI** and drive to the predetermined buy location. At the buy location, MICHAEL WRIGHT arrived in the above mentioned gray Nissan Altima. MICHAEL WRIGHT met with the CHS and provided 84 grams of cocaine to the CHS #23 in exchange for \$3,300. Once the controlled buy was completed, surveillance units followed MICHAEL WRIGHT to Racine, WI. During MICHAEL WRIGHT'S travels, TFO reviewed MICHAEL WRIGHT'S phone records and observed a 2 minute telephone communication with GERARDO LARA. Surveillance units then observed MICHAEL WRIGHT pull into the driveway of **2327 Meachem St** and drop a bag off into the garage. MICHAEL WRIGHT then returned to his vehicle without the bag and left the area. Surveillance units then followed MICHAEL WRIGHT to the 5000B Taylor Avenue, where surveillance was then completed. Affiant believes based on his training and experience that MICHAEL WRIGHT dropped off drug proceeds from the buy at **2327 Meachem St**. Affiant believes MICHAEL WRIGHT is utilizing **2327 Meachem St** as stash house for his drug proceeds.

#### **9. 10106 66<sup>th</sup> St., Kenosha WI**

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<sup>23</sup> CHS #23 information is credible and reliable because CHS #23 is providing information based on CHS #23's personal knowledge and observations and said information has been corroborated by other sources during this investigation. CHS #23 is currently working off three delivery of cocaine charges and has felony convictions for Forgery-Uttering, Manufacture/Deliver Cocaine, and three felony convictions for Medical Assistance Fraud. CHS #23 also an open criminal charge of a felony Possession with Intent to deliver Cocaine and Possession with intent to Deliver Heroin.

114. On August 10, 2021, CHS #15 acting under the direction and control of law enforcement called SARAH BECKIUS at 262-321-8564. CHS #15 requested to purchase 2.0 grams of cocaine from SARAH BECKIUS. SARAH BECKIUS advised CHS #15 the cost was \$180 dollars. SARAH BECKIUS met CHS #15 in the Starbucks parking lot, 2805 S Green Bay Rd., Racine WI, and completed the drug transaction. During the drug transaction SARAH BECKIUS provided CHS #15 2.0 grams of powder cocaine and CHS #15 gave SARAH BECKIUS the \$180 dollars. During the transaction SARAH BECKIUS was operating a white Ford Fusion bearing Wisconsin registration 944-CJC. Affiant conducted a record check of WI- 944-CJC, which listed the registered owner as Theresa Marie Newman, of **10106 66<sup>th</sup> St., Kenosha, WI**. Affiant knows through the investigation that Theresa Newman is SARAH BECKIUS' mother. Through court authorized electronic surveillance, Affiant knew that approximately 90 minutes prior this controlled buy, SARAH BECKIUS was in the vicinity of **8761 W 7 Mile Rd, Franksville, Wisconsin**. Through additional surveillance techniques, Affiant observed the same white Ford Fusion pull into the driveway of **8761 W 7 Mile Rd** and leaving the same residence of **8761 W 7 Mile Rd** about 20 minutes later. Court authorized electronic surveillance indicated SARAH BECKIUS returned home to **10106 66<sup>th</sup> St., Kenosha WI** after leaving **8761 W 7 Mile Rd** and before the controlled buy at Starbucks. Based on their training and experience, and the investigation to date, Affiant believes that BECKIUS picked up the cocaine from **8761 W 7 Mile Rd**.

**E. Telephone Records and Electronic Surveillance**

**1. Phone Numbers and Call Detail Records**

115. Throughout the investigation, it was determined that DTO members use the following phone numbers:

	a.	262-598-7249 GERARDO LARA	
	b.	414-640-0684 GERARDO LARA	
	c.	262-989-8086 JESUS LARA	
	d.	262-321-8564 SARAH BECKIUS	
	e.	262-349-1902 SARAH BECKIUS	
	f.	262-497-2716 MARQUAN WASHINGTON	
	g.	310-270-5538 MARQUAN WASHINGTON	
	h.	262-664-1177 MARIO JOHNSON	
	i.	262-456-8568 MARIO JOHNSON	
	j.	262-234-8731 TERRY BRUMBY	
	k.	262-331-4192 TERRY BRUMBY	
	l.	262-417-3060 CARL GRAYSON	
	m.	262-676-4482 MICHAEL HARDIN	
	n.	262-412-6795 Akeem First	
	o.	414-208-5605 Tirawann Barker	
	p.	262-664-3328 BRIAN PHILLIPS	
	q.	262-977-5936 BRIAN PHILLIPS	
	r.	262-331-9302	ASHLEY
WESTMORELAND			
	s.	262-909-0239 JASMINE GONZALEZ	
	t.	262-412-1294 DEBRA URNESS	
	u.	262-234-1793 MICHAEL WRIGHT	

116. Affiant and TFO's requested phone call detail records between December 19, 2020 and April 30, 2021 for 262-598-7249, used by GERARDO LARA. The records indicated GERARDO LARA had phone contact with JESUS LARA, SARAH BECKIUS, BRIAN PHILLIPS, MARQUAN WASHINGTON, and CARL GRAYSON.

117. Affiant and TFO's requested phone call detail records between July 1, 2020 and May 11, 2021 for 262-989-8086 used by JESUS LARA. The records indicated JESUS LARA had phone contact with GERARDO LARA, SARAH BECKIUS, MARQUAN WASHINGTON, and BRIAN PHILLIPS.

118. Affiant and TFO's requested phone call detail records between December 19, 2020 and May 10, 2021, for 262-321-8564 used by SARAH BECKIUS. The records indicated SARAH BECKIUS had phone contact with GERARDO LARA, JESUS LARA, and MARQUAN WASHINGTON.

119. Affiant and TFO's requested phone call detail records between July 1, 2020, and March 4, 2021, for 262-497-2716 used by MARQUAN WASHINGTON. The records indicate MARQUAN WASHINGTON had phone contact with GERARDO LARA, SARAH BECKIUS, BRIAN PHILLIPS, MARIO JOHNSON, TERRY BRUMBY, CARL GRAYSON, Akeem First, and MICHAEL HARDIN.

120. Affiant and TFO's requested phone call detail records between July 1, 2020, and March 30, 2021, for 310-270-5538 used by MARQUAN WASHINGTON. The records indicate MARQUAN WASHINGTON had phone contact with GERARDO LARA, JESUS LARA, BRIAN PHILLIPS, MARIO JOHNSON, TERRY BRUMBY, MICHAEL HARDIN, Akeem First, and CARL GRAYSON.

121. Affiant and TFO's requested phone call detail records between September 22, 2020, and March 11, 2021, for 262-664-1177 used by MARIO JOHNSON. The records indicated MARIO JOHNSON had phone contact with MARQUAN WASHINGTON, TERRY BRUMBY, Tirawann Barker, MICHAEL HARDIN, Akeem First, CARL GRAYSON and ASHLEY WESTMORELAND.

122. Affiant and TFO's requested phone call detail records between July 1, 2020, and March 4, 2021, for 262-456-8568 used by MARIO JOHNSON. The records indicate MARIO JOHNSON had phone contact with MARQUAN WASHINGTON, TERRY BRUMBY, Tirawann Barker, MICHAEL HARDIN, CARL GRAYSON, and ASHLEY WESTMORELAND.

123. Affiant and TFO's requested phone call detail records between July 1, 2020 and March 30, 2021, for 262-234-8731 used by TERRY BRUMBY. The records indicated TERRY BRUMBY had phone contact with MARQUAN WASHINGTON, MARIO JOHNSON, Tirawann Barker, MICHAEL HARDIN, and Akeem First.

124. Affiant and TFO's requested phone call detail records between July 1, 2020 and March 9, 2021, for 262-331-4192 used by TERRY BRUMBY. The records indicated TERRY BRUMBY had phone contact with MARIO JOHNSON and CARL GRAYSON.

125. Affiant and TFO's requested phone call detail records between July 1, 2020 and April 13, 2021 for 262-417-3060 used by CARL GRAYSON. The records indicated CARL GRAYSON had phone contact with GERARDO LARA, MARQUAN WASHINGTON, MARIO JOHNSON, TERRY BRUMBY, Tirawann Barker and Akeem First.

126. Affiant and TFO's requested phone call detail records between July 1, 2020 and March 30, 2021 for 262-676-4482 used by MICHAEL HARDIN. The records indicate MICHAEL HARDIN had phone contact with MARQUAN WASHINGTON, MARIO JOHNSON, TERRY BRUMBY, Akeem First, and ASHLEY WESTMORELAND.

127. Affiant and TFO's requested phone call detail records between July 1, 2020 and March 12, 2021 for 262-412-6795 used by Akeem First. The records indicate Akeem First had phone contact with BRIAN PHILLIPS, MARQUAN WASHINGTON, MARIO JOHNSON, TERRY BRUMBY, CARL GRAYSON, and MICHAEL HARDIN.

128. Affiant and TFO's requested phone call detail records between July 1, 2020 and April 9, 2021 for 414-208-5605 used by Tirawann Barker. The records indicate Tirawann Barker had phone contact with TERRY BRUMBY, MARIO JOHNSON, and CARL GRAYSON.

129. Affiant and TFO's requested phone call detail records between July 1, 2020 and April 12, 2021 for 262-664-3328 used by BRIAN PHILLIPS. The records indicate BRIAN PHILLIPS had phone contact with GERARDO LARA, JESUS LARA, MARQUAN WASHINGTON, and Akeem First.



130. Affiant and TFO's requested phone call detail records between March 1 and June 14, 2021, for 262-331-9302 used by ASHLEY WESTMORELAND. The records indicate ASHLEY WESTMORELAND had phone contact with MARIO JOHNSON and MICHAEL HARDIN.

## **2. Cellular Telephone Location Information**

131. Throughout the investigation Affiant and assisting TFO's obtained court authorized electronic surveillance of several of the DTO members. This included: GERADRO LARA (262-598-7249), SARAH BECKIUS (262-321-8564 AND 262-349-1902), BRIAN PHILLIPS (262-664-3328), MARQUAN WASHINGTON (262-497-2716), and MICHEAL WRIGHT (262-234-1793). The electronic surveillance supported information provided by SOIs and also demonstrated members of the DTO being located in close proximity of each other and the TARGET LOCATIONS. For example:

### **a. 8761 W 7 Mile Rd., Franksville, WI**

132. Between August 2 and 3, 2021, Court authorized electronic surveillance has revealed GERARDO LARA left Wisconsin and went to Kansas, specifically near Kansas City, KS. Electronic surveillance showed GERARDO LARA stayed near Kansas City for approximately 1.5 hours heading back towards Wisconsin. Assisting TFO's and Affiant conducted physical surveillance of GERARDO LARA as he entered back into Wisconsin. Surveillance units followed GERARDO LARA directly back to his home address of **8761 W 7 Mile Road, Franksville WI**. Surveillance units observed GERARDO LARA and an unidentified female exit a black pickup truck upon parking in his driveway. Based on their training and experience, and the investigation to date, case agents believe that LARA traveled to Kansas and stayed for a such a brief time because he was either picking up or delivering drugs or drug proceeds.

**b. 2100 Northwestern Ave, #405 / GERARDO LARA**

133. On September 30, 2021, court authorized electronic surveillance indicated GERARDO LARA was heading south on Interstate 94 towards Chicago, IL. Due to information learned during the investigation, Affiant believed GERARDO LARA was traveling to Illinois to pick up a large amount of cocaine to bring back to Wisconsin. Court authorized electronic surveillance indicated GERARDO LARA stopped around Blue Island, IL for approximately one to one and a half hours before returning towards Wisconsin. As GERARDO LARA continued driving north towards Wisconsin, LARA stopped at Gurnee Mills mall. TFO Haleen located GERARDO LARA'S green GMC pickup truck parked, unoccupied in the mall parking lot. TFO Haleen then located GERARDO LARA inside the shopping mall by himself. During this time, pen register/trap and trace information revealed GERARDO LARA and BRIAN PHILLIPS were having numerous telephone contacts. At approximately 1:15 pm, surveillance observed a silver vehicle, later identified as a silver Nissan Versa, WI AKS-8532, park next to GERARDO LARA'S green GMC pickup truck. No one was observed exiting the Nissan. At about 1:20 pm, GERARDO LARA exited the shopping mall and walked to his pickup truck and placed a bag inside of it. GERARDO LARA then grabbed a different bag from within his truck and placed it into the Nissan. Once the bag was placed into the Nissan, both vehicles left the mall parking lot with GERARDO LARA following closely behind the Nissan in his green GMC pickup truck. Both vehicles drove North on Interstate 94 into the State of Wisconsin. While driving north on Interstate 94, Affiant and TFO Haleen were able to make observations of the driver and front passenger females of the Nissan. Eventually the Nissan exited Highway 20 in Racine County, WI, with GERARDO LARA continuing to follow. The Nissan drove into the City of Racine, WI and eventually stopped in front of **3214 Northwestern Ave**. No one exited the Nissan. At this time, GERARDO LARA continued

driving passed the Nissan, but then circled around and parked directly behind the Nissan within a few minutes. GERARDO LARA then walked up to the Nissan and retrieved a bag out of the backseat and took it back to his vehicle. Both vehicles then drove away in separate directions. Surveillance then followed GERARDO LARA directly to **2100 Northwestern Ave.** At about 2:09 pm GERARDO LARA parked in the parking lot of **2100 Northwestern Ave**, which is the known address for his new girlfriend, Mareen Harris. At about 2:13 pm GERARDO LARA was observed carrying in a bag into **2100 Northwestern Ave.** At about 3:24 pm utilizing previously implanted surveillance, Affiant observed GERARDO LARA pull into BRIAN PHILLIPS' residence, **2213 Lawn St**, in his green GMC pickup truck. At about 3:28 pm, Affiant observed BRIAN PHILLIPS return home in his blue Dodge Dakota. At this time, both GERARDO LARA and BRIAN PHILLIPS were together at **2213 Lawn St.** TFO Haleen reviewed pen register/trap and trace information from GERARDO LARA'S and BRIAN PHILLIPS' telephones. TFO Haleen observed GERARDO LARA receive a call from a Mexico phone number while on his way back from Illinois. TFO Haleen also observed numerous phone contacts during GERARDO LARA'S trip with BRIAN PHILLIPS. TFO Haleen also located a phone number 262-498-0066, which BRIAN PHILLIPS was contacting during GERARDO LARA'S trip. A record check of 262-498-0066 indicated it belonged to Marlena L Durrah. Affiant and TFO Haleen later reviewed a RCSD jail booking photo of Marlena Durrah and positively identified the driver of the Nissan as Marlena Durrah. Based on your Affiant's training, experience, knowledge of the investigation, and facts surrounding this trip to Illinois, he believes GERARDO LARA and BRIAN PHILLIPS were in constant communication regarding GERARDO LARA picking up a large amount of cocaine. BRIAN PHILLIPS then organized and facilitated Marlena Durrah to drive to Gurnee Mills, IL to meet with GERARDO LARA to transport the cocaine into the State of Wisconsin. Once in the

City of Racine, WI, GERARDO LARA then reobtained the cocaine from Marlena Durrah and returned to his girlfriend's residence, **2100 Northwestern Ave**, with the cocaine.

**c. 2213 Lawn St, Lower Unit / BRIAN PHILLIPS and JERI BALDERAS**

134. Throughout this investigation, TFO's and Affiant utilized court-authorized electronic surveillance of GERARDO LARA's, BRIAN PHILLIPS', MARQUAN WASHINGTON's, and SARAH BECKIUS' cellular phones. Court authorized electronic surveillance has revealed that on July 9, 2021, GERARDO LARA left Wisconsin for Texas, specifically near Houston, TX. Electronic surveillance showed GERARDO LARA stayed in Texas for approximately 6 hours before turning around and heading back to Wisconsin. Electronic surveillance showed GERARDO LARA returned to Racine, Wisconsin on July 11, 2021 and immediately went to BRIAN PHILLIPS' house, **2213 Lawn St**. Electronic surveillance showed BRIAN PHILLIPS was home at the same time GERARDO LARA was at the location. Based on my training and experience, and the investigation to date, Affiant believes that LARA picked up or dropped off drugs or drugs proceeds during his short stay in Houston, Texas.

135. On August 29, 2021, while utilizing previously implemented surveillance equipment and court authorized electronic surveillance, TFO Haleen observed GERARDO LARA arrive at BRIAN PHILLIPS' residence, **2213 Lawn St**. TFO Haleen observed BRIAN PHILLIPS and GERARDO LARA get into BRIAN PHILLIPS' black Lincoln car, WI 272-VRV together. BRIAN PHILLIPS was in possession of a duffle bag which he placed in the back seat of his car. Court authorized electronic surveillance indicated BRIAN PHILLIPS and GERARDO LARA drove to the Milwaukee, WI area for about 30 minutes before returning back to BRIAN PHILLIPS' residence, **2213 Lawn St**, together. Based on the observations and circumstances, Affiant believes BRIAN PHILLIPS and GERARDO LARA were involved in a large level drug transaction.

**d. 2109 Rupert Blvd / BRIAN PHILLIPS and JERI BALDERAS**

136. According to records from Educators Credit Union (ECU), between May 20, 2021, and May 29, 2021, a total of \$51,865 was deposited into the account belonging to JERI BALDERAS who is BRIAN PHILLIPS' live in girlfriend/child's mother. TFO Haleen obtained surveillance video from ECU and identified JERI BALDERAS as the person making the deposit, except for one, which was made by PHILLIPS.

137. On June 1, 2021, a wire for \$50,701.46 was sent from JERI BALDERAS' account to US BANK- Beneficiary Name of Landmark Title of Racine. This appears to coincide with the purchase of **2109 Rupert Blvd** by JERI BALDERAS on June 2, 2021.

138. On July 23, 2021, Affiant conducted covert surveillance of **2109 Rupert Blvd** and observed a silver Kia SUV, WI AHL-6747 parked in the driveway. Affiant knows this vehicle to be used in two prior controlled buys with BRIAN PHILLIPS and JASMINE GONZALEZ. Affiant also observed a black Lincoln 4DR, WI 272-VRV, parked directly outside of the residence. Affiant knows this black Lincoln to be used in one prior controlled buy with BRIAN PHILLIPS. Affiant then observed BRIAN PHILLIPS at **2109 Rupert Blvd**.

139. On August 4, 2021, at 12:26 pm Affiant observed BRIAN PHILLIPS leave **2213 Lawn St** in his black Lincoln car bearing Wisconsin Registration 272-VRV. At 1:00 pm Affiant observed BRIAN PHILLIPS enter the front door of **2109 Rupert Blvd**. The black Lincoln, WI 272-VRV, was parked outside of **2109 Rupert Blvd** at the time BRIAN PHILLIPS entered the residence. Affiant is aware that BRIAN PHILLIPS previously utilized the mentioned black Lincoln, WI 272-VRV, during a controlled buy.

**e. 2327 Meachem St, Upper / MICHAEL WRIGHT**

140. On September 30, 2021, court authorized electronic surveillance indicated MICHAEL WRIGHT stay overnight at **700 W Michigan St., Milwaukee, WI**. In the morning hours, MICHAEL WRIGHT traveled to Racine, WI and went to, or in the vicinity of, **2327 Meachem St**. Affiant responded to **2327 Meachem St** and located MICHAEL WRIGHT'S gray Nissan rental vehicle parked in the driveway of **2327 Meachem St**. TFO Haleen reviewed pen register/trap and trace to MICHAEL WRIGHT'S telephone records and discovered MICHAEL WRIGHT had several telephone communications with 262-234-8427, which lists to Bobbie Ray King at **2327 Meachem St**. According to utilities records, Bobbie Ray King has an active account at **2327 Meachem St, Upper Unit**.

**f. 700 W Michigan St / MICHAEL WRIGHT**

141. Since September 28, 2021, court authorized electronic surveillance indicated MICHAEL WRIGHT has been in the immediate vicinity of **700 W Michigan St., Milwaukee, WI** on fourteen of the past seventeen days and spending his overtime hours at **700 W Michigan St., Milwaukee, WI**. Additionally, electronic surveillance indicated on September 29, 2021 MICHAEL WRIGHT left directly from **700 W Michigan St., Milwaukee WI** and drove to the predetermined buy location where MICHAEL WRIGHT sold 3 ounces of cocaine to CHS #23.

**F. Physical Surveillance**

142. Law enforcement conduct surveillance of DTO members throughout the investigation. According to surveillance, Affiant is aware that DTO members use the following locations and their residences and/or stash houses:

**1. 8761 W 7 Mile Rd., Franksville WI / GERARDO LARA and JESUS LARA**

143. On August 13, 2021, TFO Haleen, TFO Matson, and Affiant conducted undercover surveillance of GERARDO LARA and SARAH BECKIUS. GERARDO LARA and SARAH

BECKIUS were observed leaving together from Americas Best Value Inn & Suites hotel, 5419 Durand Ave., Racine WI. GERARDO LARA and SARAH BECKIUS entered a 2008 gray Ford Escape SUV bearing Wisconsin registration 379-WJD. SARAH BECKIUS was observed being the driver and GERARDO LARA as the front passenger. Surveillance units observed GERARDO LARA and SARAH BECKIUS stop at a Starbucks then directly to **8761 W 7 Mile Rd., Franksville WI**. According to records from the Wisconsin Department of Transportation, Wisconsin license plate 379-WJD is registered to Emily Mary Beckius of **10106 66<sup>th</sup> St., Kenosha WI 53142**. Affiant knows this address to be SARAH BECKIUS' current address.

144. On September 29, 2021, TFO Kupper observed GERARDO LARA'S green GMC pickup truck parked outside of 512 Harvey Dr, which is an address believed to be GERARDO LARA sister's house. TFO Kupper conducted covert surveillance of 512 Harvey Dr and observed GERARDO LARA exit the residence carrying a duffle bag. GERARDO LARA placed the duffle bag within his green GMC pickup truck and then drove away from the area. Court authorized electronic surveillance indicated GERARDO LARA then went to his home address of **8761 W 7 Mile Rd., Franksville WI**.

145. On October 4, 2021, TFO Haleen was monitoring electronic surveillance and observed GERARDO LARA traveling southbound into Illinois. GERARDO LARA arrived in Wheeling, Illinois, where he remained for about one hour and fifteen minutes. Electronic surveillance then indicated GERARDO LARA traveled back north to Gurnee, IL. During the trip, GERARDO LARA's phone communicated with MICHAEL WRIGHT and BRIAN PHILLIPS. Law enforcement set up surveillance in the Gurnee Mills Mall parking lot and located GERARDO LARA's green GMC Sierra parked in the lot. TFO Haleen observed GERARDO LARA, JESUS LARA, and MICHAEL WRIGHT conversing at the rear of the GMC Sierra. TFO Haleen observed



MICHAEL WRIGHT receive a package from GERARDO LARA and immediately return to a white Dodge Durango with Illinois License plate BF89692 and enter the driver's seat. The package appeared to be a large box, similar to an office box. MICHAEL WRIGHT left the area in his vehicle and traveled back to Wisconsin, while GERARDO LARA and JESUS LARA followed in the green GMC Sierra. Once in Wisconsin MICHAEL WRIGHT drove to the Castle Court Apartments area, where he pulled over and GERARDO LARA pulled behind MICHAEL WRIGHT. TFO Keland observed MICHAEL WRIGHT remove the package from the Durango and hand it to GERARDO LARA who then placed it in his GMC. MICHAEL WRIGHT immediately left the area and GERARDO LARA continued into the apartment complex. GERARDO LARA eventually left the area driving toward 7-mile Road. Electronic Surveillance showed that GERADRO LARA returned to the **8761 W 7 Mile Rd** address. Based on my training and experience, and the investigation to date, Affiant believes that that GERARDO LARA was picking up controlled substances to transport back to Wisconsin.

## **2. 2213 Lawn St, Lower Unit, Racine, WI**

146. On August 9, 2021, Affiant conducted surveillance of BRIAN PHILLIPS' residence of **2213 Lawn St**. Affiant observed BRIAN PHILLIPS leave his residence in a black Lincoln car bearing Wisconsin license plate 272-VRV, which Affiant knew was utilized by BRIAN PHILLIPS during a controlled buy on July 12, 2021. Approximately 7 minutes later, Affiant observed GERARDO LARA arrive in front of **2213 Lawn St** while operating his black Ford F350 bearing Wisconsin registration RJ4984. GERARDO LARA then walked up to **2213 Lawn St** for about 5 minutes before returning to his vehicle. GERARDO LARA then waited in his truck for approximately 14 minutes. BRIAN PHILLIPS then returned back home and pulled into his driveway of **2213 Lawn St**. GERARDO LARA immediately exited his truck and walked

up the driveway of **2213 Lawn St**. Approximately 16 minutes later, both GERARDO LARA and BRIAN PHILLIPS, left **2213 Lawn St** in their separate vehicles and follow each other Eastbound on Lawn St. Based on my training and experience, and the investigation to date, Affiant believes that GERARDO LARA and BRIAN PHILLIPS were traveling together to pick up controlled substances or drop of proceeds of drug sale.

### **3. 1604 Deane Blvd, Racine, WI**

147. On September 26, 2021, Affiant observed BRIAN PHILLIPS operating a maroon Chevy Impala bearing Wisconsin license plate 481-ZUL. Affiant observed BRIAN PHILLIPS stop in front of **1604 Deane Blvd**, which is the residence of DEBRA URNESS. Affiant observed DEBRA URNESS exit **1604 Deane Blvd** and make a quick, short-term contact with BRIAN PHILLIPS. Affiant believes based on his training and experience that DEBRA URNESS and BRIAN PHILLIPS were involved in a drug transaction. After the quick, suspected drug transaction, BRIAN PHILLIPS drove away and DEBRA URNESS went back into her residence of **1604 Deane Blvd**. About 5-10 minutes later, Det Diener observed BRIAN PHILLIPS pull into the driveway of **2109 Rupert Blvd** and enter **2109 Rupert Blvd**.

### **4. 928 Delamere Ave, Racine, WI, and 2900 Chicory Ave, Racine, WI**

148. As discussed above, CHS#6 conducted a controlled buy of crack cocaine from CARL GRAYSON at **928 Delamere Ave**.

149. On August 4, 2021, during the controlled buy with CHS # 10 Affiant observed CARL GRAYSON'S Jeep, WI AMB-8482, parked directly in front of **928 Delamere Ave**, which Affiant knows is an address associated with MARQUAN WASHINGTON.

150. On August 5, 2021, Affiant observed CARL GRAYSON'S Jeep, WI AMB-8482, parked directly in front of **2900 Chicory Ave**, which is another address directly associated with

MARQUAN WASHINGTON.

**5. 1848 Kearney Ave, Racine, WI, and 1915 Jay Eye See Avenue, Racine, WI**

151. On May 4, 2021, CHS #10 acting under the direction and control of law enforcement contacted CARL GRAYSON at 262-417-3060. CARL GRAYSON answered and advised he was not in town. Affiant observed MARIO JOHNSON in his Cadillac Escalade parked in front of **1848 Kearney Ave** at the same time. Affiant further witnessed MARIO JOHNSON have a short-term transaction with an individual who approached the Cadillac, which was consistent with a street level drug transaction. Surveillance shows that MARIO JOHNSON returned to his address of **1915 Jay Eye See Ave** after the suspected drug transaction. The Cadillac Escalade in question has Wisconsin registration AJD6875 and is registered to Carron McCray at **1915 Jay Eye See Ave**.

152. On August 9, 2021, Affiant observed MARIO JOHNSON leaving his residence of **1915 Jay Eye See Ave** in a white Jeep rental vehicle bearing an IL registration plate of CK18882. Later on in the same day, Affiant observed MARIO JOHNSON at **1848 Kearney Ave** with CARL GRAYSON.

153. On September 23, 2021, Affiant observed, two suspected drug transactions at **1915 Jay Eye See Ave**. During these suspected drug transactions Affiant observed MARIO JOHNSON'S known rental vehicle parked in the driveway of **1915 Jay Eye See Ave**. On this date, Affiant observed an unknown white male park a silver SUV in front of **1915 Jay Eye See Ave**. The white male walked around to the back of **1915 Jay Eye See Ave**, which has the access door to the upper unit of MARIO JOHNSON'S residence. Approximately 2 minutes later the same white male returned to his vehicle from behind **1915 Jay Eye See Ave** and left the area. Approximately 15 minutes after the first suspected drug transaction, Affiant observed the second

suspected drug transaction. Affiant observed an unknown black male exit the passenger seat of a black Pontiac G6 WI AMF-2275, in front of **1915 Jay Eye See Ave**. The black male walked around to the back of **1915 Jay Eye See Ave** and then returned approximately 2 minutes later. The black male returned to his vehicle and left the area.

**6. 1848 Kearney Ave, Racine, WI, and 3205 Indiana Street, Racine, WI**

154. On April 18, 2021, Affiant observed TERRY BRUMBY at **1848 Kearney Ave**. While at **1848 Kearney Ave**, Affiant observed TERRY BRUMBY complete a suspected drug transaction outside of the residence before getting into his vehicle and driving away.

155. On May 18, 2021, CHS #10 acting under the direction and control of law enforcement contacted CARL GRAYSON at 262-417-3060. GRAYSON stated that he had to go pick up and that he was “getting his money together.” CHS #10 reports that this meant that CARL GRAYSON is out of crack cocaine and was going to go pick up more. Surveillance units then watched CARL GRAYSON leave **1848 Kearney Ave** and CARL GRAYSON was followed to **3205 Indiana St**, Racine, WI (apartment building) which is a known address associated with TERRY BRUMBY. Once CARL GRAYSON arrived at **3205 Indiana St**, he went inside for approximately five - ten minutes. CARL GRAYSON then left the building and travelled back to his residence at **1848 Kearney Ave**. TFO Haleen later reviewed call detail records and found that CARL GRAYSON contacted TERRY BRUMBY just as he was leaving his residence and again as CARL GRAYSON arrived at **3205 Indiana St**. Based on my training and experience, and the investigation to date, Affiant believes that CARL Grayson went to **3205 Indiana St** to pick up additional crack/cocaine from TERRY BRUMBY due to CARL GRAYSON running out.

156. On May 27, 2021, Affiant conducted undercover surveillance at **3205 Indiana St** and observed TERRY BRUMBY and Tirawann Barker at **3205 Indiana St** in different rental

vehicles listing to Avis Rental Car. Tirawann Barker was operating a Blue Ford Explorer and TERRY BRUMBY was operating a gray Chevrolet Tahoe. According to records from Avis, both vehicles were rented by TERRY BRUMBY.

157. On June 2, 2021, Affiant observed TERRY BRUMBY operating a rental vehicle at **3205 Indiana St.** Affiant observed TERRY BRUMBY enter and exit the East face door of **3205 Indiana St.** While going in and out of the apartment building at **3205 Indiana St,** TERRY BRUMBY also changed clothes, which indicated he likely had an established residence within **3205 Indiana St.**

158. On June 16, 2021, Affiant observed TERRY BRUMBY park his Chevy Tahoe rental vehicle bearing a Texas license plate, behind **1932 Taylor Ave** and enter the apartment building through the rear door. Affiant knows based on surveillance and information during the investigation that Tirawann Barker lives at **1932 Taylor Ave, #16.** Affiant observed TERRY BRUMBY make a short term contact within the apartment building that lasted about 3-4 minutes. After TERRY BRUMBY left **1932 Taylor Ave, #16,** he reentered his rental vehicle and drove away.

159. On August 9, 2021, Affiant observed TERRY BRUMBY operating a 2021 black GMC Yukon bearing Colorado license plate BHQE50 at 3300B Indiana St. Colorado license plate BHQE50 lists to Avis Budget Car Rental LLC. Based on the investigation, Affiant is aware TERRY BRUMBY has a stash house at **3205 Indiana St, #9.**

160. On August 19, 2021, Affiant and TFO Keland observed TERRY BRUMBY'S black GMC Yukon rental vehicle parked outside **3205 Indiana St.** Affiant and TFO Keland conducted covert surveillance and observed TERRY BRUMBY exit **3205 Indiana St (East door),** enter his black GMC Yukon rental vehicle, and drive away from the apartment.

**7. 7422 Kinzie Ave, Racine, WI, 2900 Chicory Rd, Racine, WI, 928 Delamere Ave, Racine, WI, and 1848 Kearney Ave, Racine, WI**

161. On September 25, 2021, Affiant observed a gold Buick bearing Wisconsin license plate parked in TERRY BRUMBY'S driveway, **7422 Kinzie Ave**. Affiant knows for the last three consecutive days MARQUAN WASHINGTON was operating the gold Buick. During this time period, the gold Buick was observed at **2900 Chicory Rd, 928 Delamere Ave, 1848 Kearney Ave**, and now **7422 Kinzie Ave**. Based on my training and experience, and investigation to date, Affiant believes that MARQUAN WASHINGTON and TERRY BRUMBY share vehicles to distribute controlled substances.

162. On August 17, 2021, Affiant conducted covert surveillance of **928 Delamere Ave**. While conducting surveillance, Affiant observed MARQUAN WASHINGTON exit **928 Delamere Ave** via Northside residence door and enter his vehicle. Affiant followed MARQUAN WASHINGTON directly over to **1848 Kearney Ave**, where he arrived about 4 minutes later. MARQUAN WASHINGTON then walked into **1848 Kearney Ave**. During this time MARIO JOHNSON was also observed at **1848 Kearney Ave** with MARQUAN WASHINGTON.

**8. 1312 Russet St, Racine, WI**

163. On August 20, 2021, Affiant conducted covert surveillance of **1312 Russet St** and observed a black Chevy Impala bearing Wisconsin license plate AMJ-7939 and MARIO JOHNSON'S black Cadillac Escalade, bearing Wisconsin license plate AJD-6875 parked in the driveway of **1312 Russet St**. Affiant knows that MICHAEL HARDIN completed a drug transaction on August 19, 2021, while utilizing the black Chevy Impala. While conducting surveillance, Affiant observed MICHAEL HARDIN utilizing the rear door of **1312 Russet St**. Affiant also observed MICHAEL HARDIN operating the black Chevy Impala bearing Wisconsin license plate AMJ-7939.

### **9. 2200 Washington Ave, Racine, WI**

164. On October 3, 2021, Affiant conducted surveillance on **2200 Washington Ave.** Affiant observed Raven Luten's brown Chevy Malibu bearing Wisconsin license plate WI AFE-1716, parked and running at **2200 Washington Ave.** The vehicle was parked directly outside of the parking garage service door, which Affiant knows is the same door MICHAEL HARDIN utilized during prior controlled buys. Affiant identified MICHAEL HARDIN as the driver of the mentioned Chevy Malibu as the vehicle left the parking garage. Affiant knows MICHAEL HARDIN has previously utilized Raven Luten's Chevy Malibu and **2200 Washington Ave** to deliver controlled substances within the City of Racine.

### **10. 8761 W 7 Mile Rd., Franksville, WI**

165. According to records from the Wisconsin Department of Transportation, and CHS#22, GERARDO LARA'S address is **8761 W 7 Mile Road, Franksville, Wisconsin.** From August to October 2021, court authorized electronic surveillance indicated GERARDO LARA was residing at **8761 W 7 Mile Rd., Franksville WI** on a weekly, but not daily basis. The same court authorized electronic surveillance and investigative techniques indicated GERARDO LARA would also spend time at female residences or hotels with female acquaintances.

166. On September 21, 2021, SA Costible, TFO Haleen, and CHS #22 observed GERARDO LARA at **8761 W 7 Mile Rd., Franksville WI.**

167. According to CHS #22, GERARDO LARA is armed, which is consistent with photo taken by GERADRO LARA on April 17, 2021 of the Zastava Arms USA PAP M90 (AK-47 Variant) located on SARAH BECKIUS' phone.

168. According to records from the Wisconsin Department of Transportation and learned JESUS LARA'S address is also **8761 W 7 Mile Road, Franksville, WI.**



169. From August to October 2021, surveillance indicated JESUS LARA was residing at **8761 W 7 Mile Rd., Franksville, WI**. Based on publicly available records, Affiant is aware that JESUS LARA is on pretrial supervision in *State of Wisconsin v. Jesus Lara*, Racine County Case No. 2021CM546. In connection with that case, JESUS LARA's address is reported as **8761 W 7 Mile Rd., Franksville, WI**.

170. As discussed above, on October 4, 2021, GERARDO and JESUS LARA has engaged in drug-trafficking activities in Illinois. At this time, JESUS LARA was on pretrial release in his Racine County firearm and drug case.

171. According to CHS # 22, JESUS LARA is armed. As discussed above, GERARDO LARA has reported that JESUS LARA is a "killer" who is quick to anger.

172. The property at **8761 W 7 Mile Road, Franksville, WI** is approximately thirty-two acres in size. It has several outbuildings, including pole barn and horse barn where individuals could conceal themselves.

173. Based on the foregoing, Affiant believes that JESUS LARA could be armed during the execution of the search warrant at **8761 W 7 Mile Road, Franksville, WI**. Additionally, Affiant believes that given his temper and conduct while on release, JESUS LARA could disregard instructions given to him by law enforcement during the entry into **8761 W 7 Mile Road, Franksville, WI**.

#### **11. 2100 Northwestern Ave, #405, Racine, WI**

174. Based on a review of recorded jail phone calls, GERARDO LARA has a new girlfriend named "Mareena." During one recorded call, GERARDO LARA tells an unknown male that Mareena knows all his "business." Based on my training and experience, and the investigation to date, Affiant believes that Mareena knows about LARA's drug trafficking activities.

175. "Mareena" was subsequently identified by listening to Racine County Jail phone calls to GERARDO LARA's number where he discusses his relationship with a "Mareena". Physical Surveillance efforts and electronic surveillance revealed GERARDO LARA to be frequently staying at **2100 Northwestern Ave.** With the assistance of WE Energies, the address was cross referenced with the first name "Mareena" which provided law enforcement the identification of Mareena Harris. Additionally, Investigator Daniel Langendorf and TFO Haleen reviewed video surveillance from October 4, 2021 which shows GERARDO LARA entering into apt 405 after arriving home from the Gurnee, IL package drop with the two females. According to utilities records, Mareena Harris is the account holder at **2100 Northwestern Ave, #405.** Within the last 30 days, court authorized electronic surveillance, has placed GERARDO LARA at, or within close proximity, of **2100 Northwestern Ave** on an almost nightly basis. On an almost daily basis within the last three weeks, GERARDO LARA'S green GMC pickup truck was observed parked in the parking lot of **2100 Northwestern Ave.**

176. On September 28 and 30, 2021, law enforcement personally observed GERARDO LARA at **2100 Northwestern Ave.** TFO Haleen also reviewed security cameras from **2100 Northwestern Ave** and confirmed GERARDO LARA is utilizing the 4<sup>th</sup> floor of the apartment building. Affiant believes that **2100 Northwestern Ave. #405** would correspond to an apartment on the fourth floor of the building. Furthermore, TFO Haleen reviewed security cameras, which showed GERARDO LARA turning into an apartment that is consistent with the location of **2100 Northwestern Ave. #405.**

177. Affiant knows through SOI #18 stated that GERARDO LARA always carry a gun and SOI #18 stated that law enforcement needs to be careful around him. Through Affiant's

training, experience and investigation in this matter, believes his to mean that GERARDO LARA is capable of using gun violence towards law enforcement.

178. Affiant also knows through SOI # 22 that GERARDO LARA is always talking about possessing and selling guns and that GERARDO LARA is always possessing a gun wherever he is, including in vehicles.

179. Additionally, Affiant knows that photos of firearms were located on SARAH BECKIUS' phone in text messages sent between GERARDO LARA and SARAH BECKIUS. Specially law enforcement located a black Taurus G2c with an extended magazine taken on April 12, 2021 by BECKIUS (figure 8) and a Zastava Arms USA PAP M90 (AK-27 Variant) taken on April 17, 2021 by GERARDO LARA (figure 9).

180. Based on the foregoing, Affiant believes that GERARDO LARA could be armed during the execution of the search warrant at **2100 Northwestern Ave. #405**. Additionally, Affiant believes that GERARDO LARA could disregard instructions given to him by law enforcement during the entry into **2100 Northwestern Ave. #405**, especially provided the information from SOI #18 and # 22.

## **12. 2213 Lawn St, Lower Unit, Racine, WI**

181. According utilities records, JERI BALDERAS has an active utilities account at **2213 Lawn St, Lower Unit**. Based on social media and CHS information, Affiant knows JERI BALDERAS to be the girlfriend of BRIAN PHILLIPS.

182. According to records from the Racine Police Department, on August 31, 2020, BRIAN PHILLIPS was operating a silver Kia SUV, bearing Wisconsin license plate AHL-6747, during a traffic stop. According to records from the Wisconsin Department of Transportation, the

Kia SUV is registered to JERI L BALDERAS at **2213 Lawn St.**, Racine, Wisconsin. BRIAN PHILLIPS was cited and released.

183. According to records from the Racine Police Department, on March 16, 2020, police responded to a “Civil Trouble” call for service at **2213 Lawn St.** During the incident, law enforcement officers spoke with BRIAN PHILLIPS. Officers advised the involved parties, which included BRIAN PHILLIPS, were having an argument and the parties were separated.

184. Affiant personally observed a security camera on **2213 Lawn St.** According to CHS #9, BRIAN PHILLIPS watches and has observed a known law enforcement officer walk past **2213 Lawn St.** Based on the training and experience, and the investigation to date, Affiant believes that PHILLIPS seeks to avoid law enforcement detection of his drug trafficking activities at **2213 Lawn St.** Additionally, Affiant learned through confidential sources and a Crime Stoppers tip that BRIAN PHILLIPS is frequently in possession of a firearm.

185. According to publicly available records, Affiant is aware that BRIAN PHILLIPS has been convicted of the following: Misdemeanor- Possession of Drug Paraphernalia 2x, Felony- Manu / Delivery of Cocaine 3x, Felony- Possession w/Intent-Cocaine, and Misdemeanor- Obstructing. Specifically, in 2005, PHILLIPS was convicted of obstructing. Additionally, PHILLIPS is currently under the supervision of the Wisconsin Department of Corrections (DOC). Through WI DOC BRIAN PHILLIPS has a listed address of **2213 Lawn St, Lower Unit**, Racine, Wisconsin.

186. On September 26, 2021, TFO Langendorf personally observed BRIAN PHILLIPS and JERI BALDERAS at **2213 Lawn Street, Racine, Wisconsin.** Based on all the foregoing, Affiant believes that PHILLIPS and BALDERAS have resided at **2213 Lawn Street, Lower Unit, Racine, Wisconsin**, since at least March 2020.

187. A review of DOC records found that since being convicted in 2007 and being placed under DOC supervision, BRIAN PHILLIPS has violated his probation/parole at least seven times on various violations including possession of firearm by felon and drug sale / distribution.

188. Based on the foregoing, Affiant believes that BRIAN PHILLIPS could be armed during the execution of the search warrant at **2213 Lawn Street, Racine**. Additionally, Affiant believes that BRIAN PHILLIPS, who has a history of obstructive behavior, could disregard instructions given to him by law enforcement during the entry into **2213 Lawn Street, Racine**.

### **13. 2109 Rupert Blvd, Racine, WI**

189. According to publicly available records, JERI BALDERAS purchased **2109 Rupert Blvd** on June 2, 2021, for \$52,000. According to utilities records, JERI BALDERAS has had an active utilities account at **2109 Rupert Blvd** since June 19, 2021. According to review of social media and CHS information, Affiant knows JERI BALDERAS to be BRIAN PHILLIPS' girlfriend.

190. Court authorized electronic surveillance has indicated BRIAN PHILLIPS has been at **2109 Rupert Blvd** or within the close proximity at least 30 times within the last 60 days. Additionally, on September 26, 2021, Affiant and Det Diener has personally observed BRIAN PHILLIPS at **2109 Rupert Blvd**. Based on his training and experience, and the investigation to date, Affiant believes that PHILLIPS has resided at **2109 Rupert Blvd** since approximately late June 2021.

### **14. 2900 Chicory Rd, Racine, WI**

191. Based on social media, jail calls, and CHS info, Affiant knows MARQUAN WASHINGTON is dating and has children with Mystique M Davis. According to records from the Wisconsin Department of Transportation, Mystique Davis has a listed address of **2900 Chicory**

**Rd.** Affiant observed the name “WASHINGTON” and “Davis” written on a name tag on the mailbox for **2900 Chicory Rd.** Affiant is aware that during a controlled buy of crack cocaine on April 14, 2021, MARQUAN WASHINGTON told CHS #6 that his service (phone service) was messed up being down on **Chicory (Chicory Road).**

192. During the investigation, on an almost daily basis from August to October 2021, court authorized electronic surveillance has indicated MARQUAN WASHINGTON has been at or in the close proximity of **2900 Chicory Rd.** Within the last 14 days, Affiant has personally observed MARQUAN WASHINGTON operating a tan Buick Lacrosse bearing Wisconsin license plate AMT-1450. According to records from the Wisconsin Department of Transportation, license plate WI AMT-1450 is registered to Mystique M Davis at **2900 Chicory Rd., Racine WI.** On September 27, 2021, TFO Rybarik personally observed MARQUAN WASHINGTON at **2900 Chicory Rd.** MARQUAN WASHINGTON utilized a key to unlock **2900 Chicory Rd** and to enter the residence. Based on my training and experience, and the investigation to date, Affiant believes that WASHINGTON lives at **2900 Chicory Rd.**

193. Based on information from SOIs #3, #5, #7, #8, and #18, MARQUAN WASHINGTON is believed to be in possession of a firearm and to be armed.

194. According to publicly available records, MARQUAN WASHINGTON has been convicted of the following: Felony- Manufacture/Deliver THC, Felony- Possession of Firearm by Felon, Felony- Possession with Intent-THC, Felony- Possession of Firearm by Felon, Felony- Possession of THC, Misdemeanor- Possession of THC. Affiant knows from his experience that oftentimes initial charges are plead to other charges in during negotiations between prosecutors and defense attorneys in the normal course of litigation and adjudication.

195. Affiant found that MARQUAN WASHINGTON is currently under the supervision of the Wisconsin Department of Corrections (DOC). A review of DOC records found that since being convicted in 2014 and being placed under DOC supervision, MARQUAN WASHINGTON has violated his probation/parole at least 3 times on various violations including reckless endangerment, drug sale / distribution, and bodily harm to another. Since August 1, 2020, MARQUAN WASHINGTON has reported with DOC he resides at **2900 Chicory Rd.**

**15. 928 Delamere Ave Front Unit and Back Unit, Racine, WI**

196. According to utilities records, **928 Delamere Ave** is listed as two units: a front and rear unit. Affiant learned Alexandria Thomas has an active utilities on both, **928 Delamere Ave, Front Unit** and **928 Delamere Ave, Back Unit**. Based on prior law enforcement investigations and CHS information, Affiant knows that Alexandria Thomas is TERRY BRUMBY'S girlfriend.

197. On June 27, 2021, Affiant listened to Racine County Jail inmate calls from MARQUAN WASHINGTON. During one phone call, WASHINGTON said he wanted MARIO JOHNSON to pay his rent since TERRY BRUMBY is going out of town. On June 28, 2021, during another jail call, MARQUAN WASHINGTON asks MARIO JOHNSON if he paid "Alexandra (Alexandra Thomas)." MARIO JOHNSON said TERRY BRUMBY took "care of it (paying the rent)." Affiant knows that only MARQUAN WASHINGTON utilizes **928 Delamere Ave**, however the utilities and the license for an adult group home are in Alexandra Thomas' name. Due to the jail phone call conversation, Affiant believes MARQUAN WASHINGTON is paying Alexandra Thomas rent to utilize the entire **928 Delamere Ave structure (front and rear units)**.

198. According to records from the Wisconsin Department of Health Services there is an adult group home registered at **928 Delamere Ave** to Alexandra Thomas under the business



name “Caring Hearts AFH 2.” According to these records, there is not a front or rear unit for **928 Delamere Ave.**

199. Between April 2020 and October 2021, Affiant conducted hours’ worth of surveillance on various days, at various times, at **928 Delamere Ave.** At no point in the investigation did Affiant observe signs of an active adult group home at **928 Delamere Ave.** Throughout the investigation, on a weekly basis, Affiant only observed MARQUAN WASHINGTON at **928 Delamere Ave.** Based on my training and experience, and the investigation to date, Affiant believes Alexandra Thomas is operating a fictitious adult group home out of **928 Delamere Ave** to conceal MARQUAN WASHINGTON’s drug trafficking activities.

200. During the investigation, Affiant has never observed any vehicles, other than those associated with MARQUAN WASHINGTON, at **928 Delamere Ave.** This includes observations of the driveway and in front of the residence.

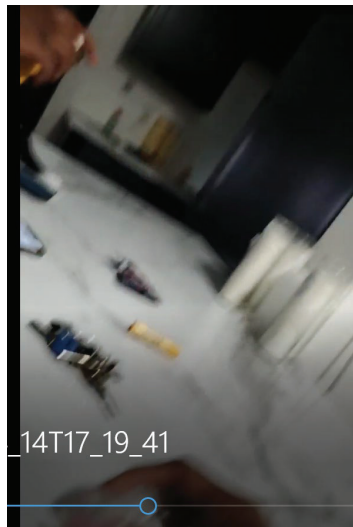
201. During this investigation, TFO Langendorf went to **928 Delamere Ave, Front Unit** and **928 Delamere Ave, Back Unit** to conduct follow-up on an unrelated investigation. TFO Langendorf knocked on the **Front Unit** and **Back Unit** of **928 Delamere Ave** and received no answer. TFO Langendorf left business cards and never received a call back from the potential occupants. TFO Langendorf made observations of what he believed to be **928 Delamere Ave** to be recently renovated. Affiant believes based on his surveillance and TFO Langendorf’s observations that **928 Delamere Ave Front Unit** and **928 Delamere Ave Rear Unit** is rarely occupied, except when MARQUAN WASHINGTON is at the residence utilizing it for illegal activity.

202. Affiant checked MICHAEL HARDIN’S known Facebook account under “Devon Carter” and located a picture of MICHAEL HARDIN fanning out money while sitting on a

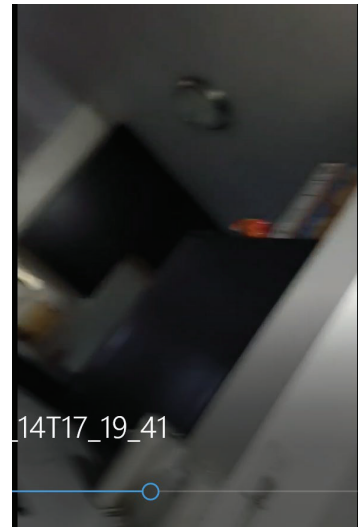
countertop. Affiant immediately recognized the photograph to match **928 Delamere Ave, Rear Unit** from a prior controlled buy with MARQUAN WASHINGTON. Affiant attached MICHAEL HARDIN'S Facebook photo as comparison (figure 8). Affiant reviewed the controlled buy video and obtained a snapshot of matching pictures (figure 9) and (figure 10). Note the yellow object in the foreground sitting on the counter, the counter tops, cabinets, and the cereal boxes on top of the refrigerator.



(Figure 8)



(Figure 9)



(Figure 10)

203. Affiant reviewed the video from the controlled buy conducted on inside **928 Delamere Ave, Rear Unit**. The video recorded the interior of the residence and did not show any signs the structure was divided into two units. Affiant, however, observed a large open area that could indicate **928 Delamere Ave** is now one large structure of a recent renovation.

204. Throughout the investigation, court authorized electronic surveillance has indicated MARQUAN WASHINGTON has been at or in the close vicinity of **928 Delamere Ave** over 20 times in the past two months. On September 23, 2021, Affiant personally observed MARQUAN WASHINGTON at **928 Delamere Ave Front Unit**.

205. Affiant observed MARQUAN WASHINGTON operating the above mentioned tan Buick Lacrosse, WI AMT-1450, while at **928 Delamere Ave.** The mentioned Buick lists to Mystique Davis at **2900 Chicory Rd.**

206. Affiant personally observed a security camera and motion light on **928 Delamere Ave.** Affiant learned through CHS #6 that MARQUAN WASHINGTON was watching his security camera during a controlled buy. Based on my training and experience, and the investigation to date, Affiant believes Marquan Washington installed and monitors his security camera to be warned by a law enforcement raid or adversaries that could potentially rob him. Monitoring the security camera allows Marquan Washington to arm himself, barricade doors, and destroy evidence if law enforcement approach the residence. This places law enforcement in a significant disadvantage and places officers in great danger

#### **16. 7422 Kinzie Ave, Racine, WI**

207. Based on prior law enforcement investigations and CHS information, Affiant is aware that TERRY BRUMBY is dating Alexandra R. Thomas. According to records from the Wisconsin Department of Transportation, the address of record for Alexandra Thomas is **7422 Kinzie Ave.**

208. On at least 30 occasions between March 2021 and October 2021, Affiant personally observed TERRY BRUMBY or his known rental vehicles at **7422 Kinzie Ave.** SOI #8 positively identified **7422 Kinzie Ave** as TERRY BRUMBY and Alexandra Thomas' residence. On September 26, 2021, Affiant personally observed TERRY BRUMBY at **7422 Kinzie Ave.** Additionally, on September 28, 2021, TFO Klinkhammer observed TERRY BRUMBY operating a white Dodge Caravan, bearing Wisconsin license plate AMT-1333, which Affiant has previously observed parked in front of **7422 Kinzie Ave.** According to records from Wisconsin Department

of Transportation, Wisconsin license plate AMT-1333 is registered to Alexandra R Thomas at **7422 Kinzie Ave.**

**17. 3205 Indiana St, #9 / TERRY BRUMBY**

209. CHS #7 positively identified **3205 Indiana St, #9** as being TERRY BRUMBY'S stash house. Between January 2021 and August 2021, CHS #7 observed TERRY BRUMBY at **3205 Indiana St** over 100 times. According to an open source search, as of June 2, 2021, **3205 Indiana St, #9** is TERRY BRUMBY'S listed address. According to utilities records, Chanel Nelson has an active utilities account at **3205 Indiana Street, #9**.

210. SOI #8 identified a photograph of **3205 Indiana St** and of Chanel Nelson. According to SOI #8, **3205 Indiana St** is TERRY BRUMBY'S stash house and Chanel Nelson is one of TERRY BRUMBY's family members.

211. Between June 2021 and October 2021, Affiant has personally observed TERRY BRUMBY at **3205 Indiana St** on least eight occasions. During one observation, Affiant observed TERRY BRUMBY enter **3205 Indiana St** and exit a short time later wearing different clothes. Based on his training and experience, and the investigation to date, Affiant believes based on TERRY BRUMBY'S clothing change that TERRY BRUMBY has personal items, including clothes, at **3205 Indiana St, #9** and has established a part-time residence there.

212. On September 28, 2021, TFO Klinkhammer and TFO Langendorf personally observed TERRY BRUMBY at **3205 Indiana St**. TFO Klinkhammer observed TERRY BRUMBY operating a white Dodge Caravan bearing Wisconsin license plate AMT-1333, which your Affiant has also observed parked in front of **7422 Kinzie Ave**. Upon TERRY BRUMBY'S arrival at **3205 Indiana St**, TFO Klinkhammer observed TERRY BRUMBY enter the East facing door to **3205 Indiana St**.

213. Affiant has previous law enforcement contacts with TERRY BRUMBY and knows him to be a drug trafficker. On September 30, 2015, Affiant received information that TERRY BRUMBY was in possession of controlled substances with the intent to sell. Affiant attempted to stop BRUMBY, who was operating a rental vehicle. During the traffic stop, TERRY BRUMBY attempted to swallow the controlled substances to prevent being caught with them and arrested. BRUMBY subsequently fled from the traffic stop and evade arrest. BRUMBY was eventually arrested and prosecuted in *State of Wisconsin v. Terry Brumby*, Racine County Case No. 2015CF001830 for second degree recklessly endangering safety, repeater, resisting/obstructing, repeater, and fleeing/eluding, repeater. On August 19, 2016 TERRY BRUMBY plead guilty to fleeing/eluding and other charges were dismissed and read in for sentencing.

214. According to publicly available records, TERRY BRUMBY has been convicted of the following: Felony- Vehicle Operator Flee/Elude Officer, Misdemeanor- Resisting or Obstructing, Misdemeanor- Possession of THC, Misdemeanor- Bail Jumping, and Misdemeanor- Obstructing.

### **18. 1915 Jay Eye See Ave., Upper Unit, Racine, WI**

215. According to records from the Wisconsin Department of Transportation, MARIO JOHNSON's address is **1915 Jay Eye See Ave.**, Racine, Wisconsin. According to utilities records, Latoya Brumby has an active utilities account at **1915 Jay Eye See Ave., Upper Unit, Racine, WI**, and Carron McCray has an active utilities account at **1915 Jay Eye See Avenue Lower Unit, Racine, WI**. Based on records from Racine County Circuit Court Case Number 2014FA000272, Latoya Brumby is MARIO JOHNSON'S child's mother. Based on social media and CHS information, Affiant also knows that Latoya Brumby is TERRY BRUMBY'S family member.

216. On September 27, 2021, Affiant personally observed MARIO JOHNSON at **1915 Jay Eye See Avenue**. During this same observation, Affiant observed MARQUAN WASHINGTON arrive in the gold Buick and stop in front of **1915 Jay Eye See Avenue** to talk with MARIO JOHNSON.

217. According to Racine Police Department records, on April, 17, 2021, there was a “Hit and Run Accident” call for service in the area of Dekoven Avenue and **Jay Eye See Avenue**. Patrol Officer Ulickey made contact with MARIO JOHNSON, who stated that he was not driving, but was in his girlfriend’s vehicle at the time of the accident. MARIO JOHNSON had the keys to the vehicle during officer Ulickey’s interview. The vehicle MARIO JOHNSON was in belonged to ASHLEY WESTMORELAND. ASHLEY WESTMORELAND also arrived on scene and provide Officer Ulickey a statement.

218. According to Racine Police Department records, on February 15, 2021, MARIO JOHNSON was involved in a “Hit and Run Accident” in the 1800 block of Kearney Ave. Officer Pumphrey responded and spoke to MARIO JOHNSON, who stated he was visiting a friend at **1848 Kearney Avenue** when he heard his parked vehicle get struck outside. MARIO JOHNSON filed a police report with Officer Pumphrey.

219. According to Racine Police Department records, on June 26, 2020, there was a “Man with Gun” call for service at **1915 Jay Eye See Ave**. The call stated that five black males were standing in the street and more than one had a gun. Upon law enforcements arrival, individuals ran from the area. While fleeing from the police a gun was thrown and recovered in the yard of **1915 Jay Eye See Ave**. Officers subsequently arrested Richard Butler JR for possession of a firearm by a felon during the incident. Based on prior law enforcement experience and CHS

information, Affiant knows based on his law enforcement experience that Richard Butler JR is a close associate of MARIO JOHNSON.

220. According to records from the Mount Pleasant Police Department, on March 9, 2018, officer attempted to stop MARIO JOHNSON, who was driving a rental vehicle. MARIO JOHNSON fled from the vehicle and during a search of the car, a large amount of suspected marijuana was located. JOHNSON was later arrested for possession with intent to distribute THC and obstructing, but was charges were not issued.

221. According to publicly available information, MARIO JOHNSON has convictions for violent crime and obstructing law enforcement. Specifically, in April 2007, MARIO JOHNSON was convicted of resisting/obstructing habitual criminality in Racine County Circuit Court Case No. 2007CF556. In September 2007, MARIO JOHNSON was convicted of obstructing an officer in Racine County Circuit Court Case No. 2007CM2799. In 2010, MARIO JOHNSON was convicted of Robbery with Use of Force in Racine County Circuit Court Case No. 10CF1590.

222. According to statements made by SOIs #6, #7 and #17, MARIO JOHNSON has been observed with a firearm and is believed to be regularly armed. And, as discussed above, during a recorded jail call with SOI #6 on April 19, 2021, JOHNSON indicated that he was looking to have a firearm returned to him. Finally, according to SOI information, MARIO JOHNSON has two pitbulls at his residence.

223. Based on the foregoing, Affiant believes that MARIO JOHNSON could be armed during the execution of the search warrant at **1915 Jay Eye See Ave Upper Unit**. Additionally, Affiant believes that MARIO JOHNSON, who has a history of obstructive behavior, could



disregard instructions given to him by law enforcement during the entry into **1915 Jay Eye See Ave Upper Unit.**

**19. 1829 Franklin St, Racine, WI**

224. According to records from the Wisconsin Department of Transportation, ASHLEY WESTMORELAND has a listed address of **1829 Franklin Street.**, Racine, Wisconsin. According to utilities records, WESTMORELAND has an active utilities account at **1829 Franklin Street.**

225. On September 21, 2021, CHS # 17 personally observed ASHLEY WESTMORELAND within her residence of **1829 Franklin Street.** According to publicly available records, ASHLEY WESTMORELAND has the following convictions: Misdemeanor-Possession of Cocaine and Misdemeanor- Disorderly Conduct.

**20. 1848 Kearney Ave, #2 / CARL GRAYSON**

226. As discussed above, CHS#6, CHS#10, and CHS#13 conducted ten total buys from **1848 Kearney Ave, Racine, WI .**

227. According to records from the Wisconsin Department of Transportation, CARL GRAYSON has a listed address of **1848 Kearney Ave, #2.**, Racine, Wisconsin. According to utilities records, GRAYSON has an active utilities account at **1848 Kearney Ave, #2.**

228. Within the last two weeks, Affiant has personally observed CARL GRAYSON at **1848 Kearney Ave** on an almost daily basis, several times a day.

229. According to publicly available information, CARL GRAYSON does not have any criminal convictions in Wisconsin. However, CARL GRAYSON has the following convictions in other states: False Declaration of Ownership in Pawn (OK), Carry Firearms after Conviction / During Probation (OK), Rec/Poss/Conc Stolen Property (OK), Grand Larceny (OK), Theft (IL), Battery (IL), Possession of Cannabis (IL), and Carry/Poss Firearm in Public (IL). Based on

CHS#6, CHS#7, CHS#10, CHS#16, and SOI#18 information, Affiant learned that CARL GRAYSON has discussed having a firearm, has a fortified door, and a pitbull (guard dog) at his residence.

**21. 1312 Russet St / MICHAEL HARDIN**

230. According to utilities records, Artasia Echoles has an active utilities account at **1312 Russet Street**. Based on previous law enforcement investigations and statements by SOI #7, Affiant knows that Artasia Echoles is dating MICHAEL HARDIN.

231. As discussed above, law enforcement conducted several controlled buys from HARDIN during which HARDIN was present at **1312 Russet St** before, during, or after the controlled buy.

232. On September 23, 2021, TFO Baclawski personally observed MICHAEL HARDIN at **1312 Russet St**. Based on information from CHS # 3, CHS #6, and CHS #7, Affiant has learned that MICHAEL HARDIN is in possession of firearms at his residence.

233. According to publicly available information, MICHAEL HARDIN has been convicted of the following: Felony- Manufacture / Deliver THC, Felony- Possession with Intent THC, Misdemeanor- Discharge Firearm w/in 100 Yards of Building, and Felony- Robbery with Use of Force.

234. MICHAEL HARDIN is currently under the supervision of the Wisconsin Department of Corrections (DOC). A review of DOC records found that since being convicted in 2012 and being placed under DOC supervision, MICHAEL HARDIN has violated his probation/parole at least 2 times on various violations including possession of firearm by felon and drug sale / distribution. MICHAEL HARDIN provided DOC with a residence address of 1313 Bluff Ave, Racine, WI 53403 on April 1, 2019. However, based on my training and experience

and the investigation to date, Affiant does not believe that MICHAEL HARDIN actually resides at this address.

## **22. 2200 Washington Ave #212 / MICHAEL HARDIN**

235. As discussed above, MICHAEL HARDIN has utilized Raven Luten's vehicle to sell and distribute controlled substances. According to records from the Wisconsin Department of Transportation, Raven Luten and her vehicle list to **2200 Washington Ave, #212**. Additionally, according to utilities records, Raven Luten has an active account at **2200 Washington Ave, #212**. According to the rental agreement for **2200 Washington, #212**, and Raven Luten is the listed renter for this apartment.

236. As discussed above, during controlled buys, MICHAEL HARDIN was picked up from his residence, 1312 Russet St, and had to go to **2200 Washington Ave** to pick up crack cocaine to deliver to CHS #7 as mentioned in paragraph 76 and 83. During one controlled buy, MICHAEL HARDIN told CHS#7 stated that one of his "girls" lives in **2200 Washington**. Case agents reviewed the audio recording and found that HARDIN's statement is consistent with CHS#7's version of events. On October 3, 2021, Affiant personally observed MICHAEL HARDIN at **2200 Washington Ave.**, operating Raven Luten's vehicle. Based on my training and experience, and the investigation to date, Affiant believes that by MICHAEL HARDIN repeatedly using Raven Luten's vehicle and going to her residence of **2200 Washington Ave, #212**, HARDIN is using **2200 Washington Ave, #212** as a stash house for his controlled substances.

## **23. 1604 Deane Blvd / DEBRA URNESS**

237. According to utilities records, Diane Hoaglund has an active utilities account at **1604 Deane Blvd**. Affiant conducted a record check with the Department of Transportation, which indicated Diane Hoaglund's address to be **1604 Deane Blvd**; however, the record also

indicated Diane Hoaglund to be deceased since June 3, 2021. Affiant is also aware that Maresh-Meredith & Acklam Funeral Home in Racine, Wisconsin has an obituary for Diane Hoaglund, which indicated she passed away on June 3, 2021.

238. CHS #20 advised Det Muller that DEBRA URNESS resides at **1604 Deane Blvd.** As discussed above, in September 2021, URNESS delivered crack cocaine to CHS#20 from **1604 Deane Blvd.**

239. On September 26, 2021, Affiant personally observed DEBRA URNESS at **1604 Deane Blvd.** Affiant observed BRIAN PHILLIPS stop at **1604 Deane Blvd.**, make a quick contact with DEBRA URNESS, and then depart the area. Based on my training and experience, and the investigation to date, Affiant believes this is consist with PHILLIPS and URNESS engaging in a drug transaction.

#### **24. 700 W Michigan St, W405, Milwaukee WI / MICHAEL WRIGHT**

240. According to CHS #7, MICHAEL WRIGHT is currently dating Taleatha Burnette. According to records from the Wisconsin Department of Transportation, Taleatha Burnette has a listed address of **700 W Michigan St #W405, Milwaukee WI.** According to utilities records, Taleatha Burnette is the active account holder at **700 W Michigan St #W405, Milwaukee WI.**

241. On September 27, 2021, TFO Matson observed MICHAEL WRIGHT entering **700 W Michigan St, Milwaukee WI.** Later that same day, TFO Matson observed MICHAEL WRIGHT leaving **700 W Michigan St., Milwaukee WI** with Taleatha Burnette.

242. On the early morning hours of September 28, 2021 TFO Matson observed MICHAEL WRIGHT'S gray Nissan rental vehicle parked outside of **700 W Michigan St., Milwaukee WI.** On the same day, later in the afternoon, TFO Matson observed MICHAEL WRIGHT and Taleathra Burnette exit **700 W Michigan St., Milwaukee WI** together.

243. On September 29, 2021, MICHAEL WRIGHT was at **700 W Michigan St., Milwaukee WI** and left the mentioned residence and then completed a multiple ounce controlled buy of cocaine with CHS #23.

244. According to publicly available records, MICHAEL WRIGHT has been convicted of the following: Felony- Hit and Run- Injury, Felony- Fleeing/Eluding, Felony- Manufacture/Delivery of cocaine 3x, Felony- bail jumping, and Felony- Attempted Armed Robbery with use of force. Additionally, MICHAEL WRIGHT is currently under the supervision of the Wisconsin Department of Corrections (DOC). A review of DOC records found that since being convicted in 2007 and being placed under DOC supervision, MICHAEL WRIGHT has violated his probation/parole at least seven times on various violations including battery/child abuse/endanger safety, absconding, and resist arrest. MICHAEL WRIGHT provided DOC with a residence address of 1650 Monroe Ave., Racine, WI 53405. However, for the reasons discussed above, case agents do not believe that Michael Wright actually resides at this address.

#### **25. 2327 Meachem St, Upper Unit / MICHAEL WRIGHT**

245. According to utilities records, Bobbie King has an active account at **2327 Meachem St, Upper Unit**. According to records from the Wisconsin Department of Transportation, Bobbie King resides at **2327 Meachem St**.

246. On September 29, 2021, MICHAEL WRIGHT delivered 84 grams of cocaine to CHS #23. After the controlled buy, surveillance followed MICHAEL WRIGHT to **2327 Meachem St., Racine WI**. While at this address, surveillance observed WRIGHT carry a bag out from his vehicle to the garage of **2327 Meachem St**. WRIGHT came back to his vehicle without the bag and left the residence. Based on my training and experience, and the investigation to date, Affiant

believes that WRIGHT uses **2327 Meachem St.** and the garage at this address to store drugs and drug proceeds.

247. On September 30, 2021, court authorized electronic surveillance indicated MICHAEL WRIGHT was at, or in the close vicinity, of **2327 Meachem St.** Affiant responded to **2327 Meachem St** and observed the vehicle that MICHAEL WRIGHT used to deliver cocaine on September 29 parked in the driveway of **2327 Meachem St.**

248. According to pen register and trap and trace data for MICHAEL WRIGHT'S telephone, between September 28 and October 1, 2021, he had 21 communications with Bobbie King's telephone number. According to electronic surveillance, MICHAEL WRIGHT'S telephone, has been at, or in the close vicinity, of **2327 Meachem St** on a routine basis between September 30, 2021 and October 11, 2021. Based on my training and experience, and the investigation to date, Affiant believes based that MICHAEL WRIGHT is utilizing **2327 Meachem St** and the garage at this address as a stash house for money from drug proceeds and/or controlled substances.

#### **26. 10106 66<sup>th</sup> St., Kenosha WI / SARAH BECKIUS**

249. According to publicly available records, SARAH BECKIUS was charged with resisting and obstructing and two counts of bail jumping in Racine County Circuit Court Case Number 2021CF001404. In connection with that case, BECKIUS has reported an address of **10106 66<sup>th</sup> St., Kenosha WI.** Affiant has personally observed SARAH BECKIUS at **10106 66<sup>th</sup> St., Kenosha WI** in the last 45 days, most recently on September 27, 2021. And, according to court-authorized electronic surveillance BECKIUS is at **10106 66<sup>th</sup> St., Kenosha WI** on a nightly basis.

250. Affiant is aware that SARAH BECKIUS advised TFO Rybarik and TFO Haleen she would be residing with her mother, Theresa Newman, in Kenosha while being out on bond

from a Racine County criminal case. Affiant conducted a record check of with Wisconsin Department of Transportation and verified Theresa Newman list address is 10106 66<sup>th</sup> St., Kenosha, WI.

#### **IV. CONCLUSION**

251. For the reasons discussed herein, there is probable cause to believe that GERARDO LARA, MARQUAN L. WASHINGTON, MARIO M. JOHNSON, TERRY BRUMBY, JR., MICHAEL D. HARDIN, CARL C. GRAYSON, PLAZE E. ANDERSON, BRIAN L. PHILLIPS, MICHAEL A. WRIGHT JR., DEBRA J. URNESS, JASMINE J. GONZALES, SARAH A. BECKIUS, and ASHLEY M. WESTMORELAND (hereinafter “TARGET SUBJECTS”) with various drug trafficking offenses, including conspiracy to distribute cocaine and cocaine base in the form of “crack cocaine.” Further, there is probable cause to believe that located at and in the following properties, more fully described in Attachment A and collectively referred to as “TARGET LOCATIONS,” are items that constitute evidence of the crimes committed by the TARGET SUBJECTS, including violations of Title 21, United States Code, Sections 841 and 846 (conspiracy to distribute cocaine and cocaine base in the form of “crack cocaine”) and 31, United States Code Section 5324(a)(3)(structuring to evade reporting requirements), as described in Attachment B.